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EPA Superfund
Record of Decision:

NATIONAL PRESTO INDUSTRIES, INC.
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EAU CLAIRE, WI
05/15/1996

RECORD OF DECISION

DECISION SUMMARY

NATIONAL PRESTO INDUSTRIES, INC. SITE

THIRD OPERABLE UNIT

EAU CLAIRE, WISCONSIN

Prepared By:

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region V

Chicago, Illinois

May 1996

Declaration
Selected Remedial Alternative
for the
National Presto Industries, Inc. Site
Eau Claire, Wisconsin

Site Name and Location

National Presto Industries, Inc. Site
3925 N. Hastings Way
Eau Claire, Wisconsin 54703

Statement of Basis and Purpose

This decision document presents the selected remedial action for the National Presto Industries, Inc. Site ("NPI Site" or "the Site) in Eau Claire, Wisconsin, which was chosen in accordance with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA") and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan ("NCP"). This decision document explains the factual and legal basis for selecting the remedy for the NPI Site. The information supporting this remedial action decision is contained in the administrative record for this Site. The State of Wisconsin concurs on the selected remedy.

Assessment of the Site

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Record of Decision ("ROD"), may present an imminent and substantial endangerment to public health, welfare, or the environment.

Description of the Selected Remedy

The selected remedy is the final remedy for the site. In addition to those response actions previously completed and currently underway at the NPI Site, the United States Environmental Protection Agency ("U.S. EPA") has determined that the following additional measures should be implemented in order to fully address all threats to human health and the environment posed by contamination at the Site:

- Melby Road and East Disposal Sites: installation of a soil vapor extraction system ("SVE") at the Melby Road Disposal Site, removal of concentrated wastes (if any) identified by the SVE at the Melby Road Disposal Site, excavation and consolidation of East Disposal Site wastes with Melby Road wastes, and installation of a multi-layer cap compliant with Wisconsin Administrative Code Chapter NR 660 over combined wastes at the Melby Road Disposal Site;

- Drainage Ditch 3: removal of contaminated soils and consolidation with wastes at the Melby Road Disposal Site;

- Dry Wells 2 and 5: removal of contaminated soils and disposal in an off-site landfill;

- Plume 1-2: continued operation of the two-column air stripper at the leading edge of the ground-water contaminant plume, continued operation of an on-site pump and treat system to prevent the off-site migration of contaminated ground water, and long term ground-water monitoring of Plume 1-2;

- Plumes 3 and 4: continued operation of an on-site pump and treat system to prevent the off-site migration of contaminated ground water, long-term ground-water

monitoring of Plumes 3 and 4, and surface water sampling in Lake Hallie; and

- Plume 5: long-term ground-water monitoring of Plume 5 and surface water sampling in Lake Hallie.

Declaration of Statutory Determinations

The selected remedy is protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost effective. The remedy utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable, and satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element.

Because this remedy will result in hazardous substances remaining on site above health-based levels, a review will be conducted every five years after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment.

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SUMMARY OF REMEDIAL ALTERNATIVE SELECTION
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DECISION SUMMARY OF FINAL REMEDIAL ACTION

NATIONAL PRESTO INDUSTRIES, INC. SITE
EAU CLAIRE, WISCONSIN

I. SITE NAME, LOCATION AND DESCRIPTION

The National Presto Industries, Inc. Site ("NPI Site" or "the Site") is located at 3925 N. Hastings Way in Eau Claire, Wisconsin (Figure 1). The Site lies within the City of Eau Claire, with the exception of approximately 9 acres in the extreme eastern part of the property, which are located in the Town of Hallie, and approximately 4 acres in the extreme southern part of the property, which are located in the Town of Seymour. Most of the NPI Site, comprising approximately 320 acres, is situated in Chippewa County; a portion is located along the northern border of Eau Claire County.

The immediate vicinity of the Site is characterized by light residential and commercial development. The unincorporated Town of Hallie is located north and east of the Site, while the City of Eau Claire is located south and west of the Site.

The Site is relatively flat and abuts a sandstone ridge to the south. The areas north and west are also relatively level, generally sloping gradually toward the Chippewa River which is located approximately 2 miles north and west of the Site. Lake Hallie lies approximately 1 mile north of the Site and is an impounded remnant of a former channel of the Chippewa River.

Extending southward from Lake Hallie through the northwestern portion of the Site and westerly to the Chippewa River is a buried pre-glacial valley that serves as a primary drinking water aquifer in the Eau Claire area. Many private wells immediately north of the Site are finished in sand and gravel deposits within the buried valley. Approximately 2 miles west of the Site, the Eau Claire Municipal Well Field ("ECMWF") draws from the same buried valley deposits. The well field serves approximately 60,000 people.

Notable surface features at the Site include the main building, a number of smaller buildings, and Lagoons Nos. 1, 2, 3 and 4. Lagoon No. 1 is a former sand and gravel pit with an irregular shape and is approximately 1.5 acres in size. Lagoons Nos. 2, 3 and 4 are approximately 14, 3.1 and 3.4 acres in size, respectively.

A 6-foot, chain link fence surrounds the western one third of the Site, including the main building and Lagoon No. 1, while the remaining areas of the Site are surrounded by a 4-foot wire fence. A security alarm system is currently in place to restrict access.

II. SITE HISTORY AND ENFORCEMENT ACTIVITIES

A. Site History

The property which now comprises the NPI Site was originally owned by various farmers who utilized the land for agriculture. After the United States government (War Assets Administration) acquired the property, two government contractors manufactured radar tubes and ordnance chemicals at the facility until 1945. NPI purchased the property from the federal government in 1947. The company initially manufactured household appliances and outboard motors at the facility, then added defense-related products in 1951. By 1954, NPI had dedicated the Site entirely to defense-related manufacturing, primarily the production of metal parts for 105MM and 8-inch shells, under contract with the Department of the Army ("DOA").

Between 1959 and 1965, NPI engaged in little to no active production at the Site. In 1966, the Site again was activated; multi-shift production continued until the mid-1970s. Except for a 6-month research and development contract in late 1983 and early 1984, production of the 8-inch shells ceased in 1971. Production of the 105MM projectiles ceased in 1980.

From 1981 to 1993, National Defense Corporation ("NDC"), a wholly owned subsidiary of NPI, entered into annual standby contracts with the DOA to maintain the Site in a high state of readiness. These contracts

provided for the storage and maintenance of the government-owned machinery and equipment. These contracts were terminated in October 1993 and most of the equipment has since been disassembled and sold.

The most environmentally significant waste stream generated from NIP's defense-related activities was waste forge compound. In its pure form, forge compound comprised approximately equal parts of graphite, asphalt and mineral oil. NPI used this mixture as a lubricant in the forging operation of the production of 105MM shells. "Waste" forge compound contains metals and volatile organic compounds ("VOCs"), primarily 1,1,1-trichloroethane ("TCA"), a solvent used for cleaning the forge compound from the manufacturing equipment. The waste water discharged by NPI to Lagoon No. 1 contained significant amounts of waste forge compound. Additionally, between 1966 and 1970, NPI landfilled waste forge compound in an area northeast of the main plant, generally referred to as the "Melby Road Disposal Site." Finally, waste forge compound has also been discovered in an area near the east property line of the Site. This area is generally identified as the "East Disposal Site." The United States Environmental Protection Agency ("U.S. EPA") considers Lagoon No. 1 and the Melby Road Disposal Site to be the most significant sources of the TCA ground-water1 contamination attributable to the Site. Wastes located at the East Disposal Site are the source of the trichloroethene ("TCE") ground-water contamination in Plume 5.

1 Standard U.S. EPA nomenclature defines the term "ground water" as a noun and the term "ground-water" as an adjective.

The four ground-water plumes associated with the Site are depicted in Figure 2 of this Record of Decision ("ROD"). Plume 1-2, approximately 2.8 miles in length, originates at the southwest corner of the NPI Site, extends west and terminates at the ECMWF. Plume 3, approximately 1 mile long, originates at the Melby Road Disposal Site and extends north to Lake Hallie. Plume 4, also approximately 1 mile long, is located north of the Site and overlaps with Plume 3 as the two migrate to Lake Hallie. Plume 5, approximately 1 mile long, originates at the East Disposal Site and also extends north to Lake Hallie.

B. Response Actions

A significant amount of cleanup work has already been conducted in connection with the NPI Site and its predecessor, the ECMWF Superfund Site.

In May 1986, NPI entered into an agreement with U.S. EPA and the Wisconsin Department of Natural Resources ("WDNR") to conduct the Remedial Investigation/Feasibility Study ("RI/FS") at the Site. An Administrative Order by Consent became effective on July 8, 1986. The purpose of the RI was to identify sources of contamination and to characterize the contamination at the Site. The RI was finalized on September 12, 1994. The Final RI includes a Baseline Risk Assessment which was conducted to characterize the current and potential threat to public health and the environment at the Site.

The final ROD for the ECMWF Site, which was issued prior to U.S. EPA's identification of the NPI Site as the source of VOC contamination in Plume 1-2, was issued on March 31, 1988. The ECMWF ROD, with which WDNR concurred, provided for continued operation of a two-column air stripper constructed as an initial remedial measure for the ECMWF Site. The air stripper continues to operate effectively, and currently treats approximately 6 to 7 million gallons of water daily. The air stripper is located at the end of the longest of the NPI ground-water contaminant plumes. Approximately $4 million in Superfund monies were dedicated for the ECMWF RI/FS, design and construction of the air stripper. In 1993, NPI reimbursed U.S. EPA for more than 95% of those costs and accepted responsibility for funding operation and maintenance of the air stripper until such time that U.S. EPA determines, consistent with this final ROD for the NPI Site, that treatment of the municipal water supply is no longer necessary.

The final ROD for the ECMWF Site further provided for the extension of municipal water service from the City of Eau Claire to private well users in the area affected by Plumes 1 and 2 (identified as Plume 1-2 in later documents).2 During the implementation of this component of the ECMWF ROD, it became apparent to U.S. EPA and WDNR that, because of the sensitive nature of providing municipal services to unincorporated areas, this component of the selected remedy was likely to be unimplementable for the buffer zone adjacent to (then-designated) Plume 2. U.S. EPA decided, accordingly, to delay implementation of this aspect of the ECMWF ROD until a more thorough study of the problem could be completed.

2 The final boundaries of the affected area were determined according to the results of extensive private and monitoring well sampling conducted between 1985 and 1989. NPI conducted additional sampling in the same area during the NPI RI under the direction of U.S.EPA and WDNR to fully define the nature and extent of private well contamination. U.S. EPA worked closely with WDNR's District Office in Eau Claire to integrate data generated during the NPI RI with the historical database to ensure that the affected area encompassed private wells contaminated or threatened by contamination from the NPI Site.

In the interim, on April 25, 1989, U.S. EPA issued a Section 106 Unilateral Administrative Order pursuant to which NPI implemented a temporary bottled water distribution program for all private well users in the unincorporated areas affected by Plumes 3, 4 and 5. The temporary bottled water program cost an estimated $100,000.

Next, on August 1, 1990, U.S. EPA issued a ROD under the auspices of the NPI Site selecting a permanent alternative drinking water supply for the area affected by ground-water Plumes 3, 4 and 5. Pursuant to a Section 106 Unilateral Administrative Order issued in March of 1991 to NPI and NDC, these companies funded the construction of the newly-created Hallie Sanitary District's water supply system as well as the extension of the City of Eau Claire's ("the City") municipal water service to those portions of the affected area that had annexed to the City. The first service connections to the Hallie Sanitary District were completed in December, 1991 and, by the middle of the following summer, the District was fully operational and servicing the affected area within the Town of Hallie. City of Eau Claire hook-ups to those portions of the affected area which had annexed to the City were also completed by fall 1991. Approximately $3.65 million has been spent implementing the remedy selected in the August, 1990 interim action ROD. In addition to the creation of the Hallie Sanitary District, local regulations and ordinances currently restrict the use of private wells in both the City and the Town of Hallie. Both the City and the Town of Hallie prohibit the potable use of private water in areas connected to the municipal supplies, and private wells must be disconnected from indoor plumbing. Approximately one year later (September, 1991), U.S. EPA issued a ROD for the selected interim action for on-site contaminated ground water at the NPI Site. The response objective of this interim action was to prevent the off-site movement of contaminant Plumes 1-2 and 2, and to prevent further environmental degradation of the ground water. The selected remedy included installation of ground-water extraction wells and treatment of the extracted water by two independent cascade aeration units, with discharge of the treated ground water via the City of Eau Claire storm sewer system for transport to the Chippewa River. WDNR concurred in the selected remedy for on-site ground water, and determined that the selected cascade aeration remedy satisfied the Best Available Technology requirements of the federal Clean Water Act and chapter NR 220 of the Wisconsin
Administrative Code. (See ROD, Interim Action Alternative Selection, 9/30/91, p. 32.)

On July 2, 1992, U.S. EPA issued NPI and NDC another Section 106 Unilateral Administrative Order, which required these companies to construct or fund the construction of the on-site ground-water treatment cascade system selected in the September, 1991 interim action ROD. Such construction activities were completed in February, 1994 and the ground-water treatment system began operation in March, 1994. To date, approximately $1 million has been spent implementing the 1991 ROD. Annual operation and maintenance costs for this treatment system are approximately $50,000.

Finally, on October 14, 1993, U.S. EPA, NPI and NDC entered into an Administrative Order by Consent for the performance of time-critical on-site removal activities. This Order, subsequently modified on November 4, 1994, provides for: (1) time-critical excavation of the waste forge compound from Lagoon No. 1 and the East Disposal Site; and (2) use of such wastes as a supplemental fuel at a cement kiln approved under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, 100 Stat. 1613 (1986) ("CERCLA"). Non-time-critical components of the removal action include characterization, evaluation, design and remediation of soils and soil gas, if any, remaining in Lagoon No. 1 after the excavation is complete. The estimated cost of the work to be completed pursuant to the removal action is $4.4 million. By the end of 1995, almost all of the waste forge compound materials had been excavated from Lagoon No. 1 and the East Disposal Site. Final excavation and characterization work will continue in Spring 1996.

The FS was finalized on September 19, 1995. This FS provides a detailed analysis of alternatives evaluated for the final remedial action for the NPI Site.

III. HIGHLIGHTS OF COMMUNITY PARTICIPATION

The U.S. EPA released its Proposed Plan for the final remedy for the Site on September 20, 1995, and made it available for public review and comment. The Proposed Plan and supporting documents have been made available at the information repositories at the U.S. EPA Region V offices, the Chippewa Falls Public Library, and the Hallie Town Hall. U.S. EPA has been placing relevant information in these repositories since 1987. The Proposed Plan was mailed to everyone on U.S. EPA's mailing list, and press releases were sent to local media. Notice of the availability of the Proposed Plan was also included in advertisements in the Eau Claire Leader Telegram and the Chippewa Falls Herald in September 1995. Before reaching a final decision on how the Site contamination would be addressed, U.S. EPA held a public meeting on September 27, 1995 at the Hallie Town Hall. At this meeting, representatives of U.S. EPA answered questions about the proposed remedy and accepted formal comments from the public on the Proposed Plan and remedial alternatives. U.S. EPA also accepted written comments during the comment period, which ran from
September 20, to October 20, 1995. A response to all comments received during the public comment period is contained in the Responsiveness Summary, which is attached to this ROD.

IV. SCOPE AND ROLE OF RESPONSE ACTION WITHIN SITE STRATEGY

As with many Superfund sites, the problems at the NPI Site are complex. As noted above, early site characterization activities conducted as part of the RI identified contaminated drinking water supplies that could be addressed before full characterization activities were complete. Therefore, to accelerate site remediation, U.S. EPA, in consultation with WDNR, organized the work into three operable units ("OUs") and a removal action. These are as follows:

> Alternate drinking water supply (OU #1): A permanent replacement drinking water supply for the areas affected by the contaminated ground water.
>
> Interim Action (OU #2): Containment and treatment of on-site ground water at the Melby Road Disposal Site and the southwestern portion of the Site downgradient of Lagoon No. 1 and Ditch No. 3.
>
> Final Remedy (OU #3): Final remediation of the on-site source areas including the Melby Road Disposal Site, the East Disposal Site, Ditch No. 3, and Dry Wells 2 and 5. Continued remediation of the plumes emanating from the Site.
>
> Removal Action: Time-critical removal of liquid and solid waste forge compound at Lagoon No. 1 and the use of such wastes as a supplemental fuel at a cement kiln. The 1993 Administrative Order by Consent, subsequently modified in 1994, also provides for non-time-critical removal actions including the characterization, evaluation, design, and final remediation of remaining soils and soil gas, if any, in the vadose zone at Lagoon No. 1. All reports generated as a part of these actions will be included in the Administrative Record for this Site.

This ROD addresses the final remedy for the Site. The remaining threats posed by this Site to human health and the environment are primarily associated with the contaminated soils at the Site. This action will address all remaining on-site source areas including the Melby Road Disposal Site, the East Disposal Site, Ditch No. 3 and Dry Wells 2 and 5 (see Figure 3). Since previous remedial actions have already addressed threats to human health and the environment posed by contaminated ground water, this action will address the continued cleanup of contaminated ground water in Plumes 1-2, 3, 4 and 5.

V. SUMMARY OF SITE CHARACTERISTICS

A. Geology and Hydrogeology

The Site is located near the edge of the glacial outwash terrace and part of the property lies on the flanking ridge. Surficial deposits of glacial outwash (sand and gravel) overlie the Mount Simon Formation (sandstone) of Cambrian Age except along the southeastern portion of the property where the sandstone ridge is exposed and in the buried valley where the sandstone has been removed by erosion. The Mount Simon Formation is underlain by Precambrian rocks, usually granite.

At the eastern and extreme southern portions of the Site, where ground water occurs primarily in the sandstone bedrock, the ground water generally flows to the northwest. At the northwestern portion of the Site, where ground water occurs in alluvial deposits overlying bedrock, ground-water flow is more complex due to the existence of a buried valley and a water table divide. The water table divide extends in a northwestern direction from the northwest corner of the Site. South of the divide, ground water flows westward into the buried valley to ECMWF and the Chippewa River. North of the divide, ground water flows north and discharges at Lake Hallie.

B. Nature and Extent of Contamination

The RI investigation included numerous sampling and investigative activities since late 1986. Work conducted during the RI included sampling and analysis of ground water, soils, soil vapor and waste materials, and geologic and hydrogeologic studies.

The RI identified VOCs, including TCA, TCE, tetrachloroethene ("PCE") and their degradation products, 1,1,-dichloroethane ("1,1-DCA"), 1,1-dichloroethylene ("1,1-DCE"), and 1,2-dichloroethylene ("1,2-DCE") in waste forge compound, waste forge compound/soil mixtures, soil, other wastes, and ground water at the NPI Site. Semi-volatile organic compounds ("SVOCs") and trace metals were also detected in these media. However, SVOCs were not detected in ground water from monitoring wells at or downgradient of the areas of concern. Forge compound in its virgin state is composed of approximately one-third asphalt, which contains polyaromatic hydrocarbons ("PAHs"), a class of SVOCs.

Source Areas

Waste forge compound/soil, other wastes, and soil containing contaminants of concern were found at the following areas: Lagoon no. 1, the Melby Road Disposal Site, the East Disposal Site, Drainage Ditch 3, and Dry Wells 2 and 5. The RI report contains analytical data for these areas. It is possible, although not likely, that unidentified source areas exist at the NPI Site, given its 320-acre size and long, complex operational history. U.S. EPA has investigated, however, all available records of the Site, including aerial photographs taken at the height of NPI defense-related operations.

The RI source characterization revealed the presence of VOCs, SVOCs, and/or metals at the areas of concern. The most commonly found VOCs were TCA, TCE and 1,1-DCA. Polychlorinated biphenyls ("PCBs") were detected in Dry Wells 2 and 5 and in two samples of drummed waste from the East Disposal Site. Characterization of the waste forge compound in Lagoon No. 1 revealed the presence of a number of SVOCs including phenanthrene, anthracene, fluoranthene, pyrene, and chrysene.

Lagoon No. 1

Remediation of the Lagoon No. 1 area was addressed by the October 1993 Administrative Order by Consent and the October 1994 Modification issued by U.S. EPA. The Lagoon No. 1 pumpable waste forge compound was removed, fuel blended and burned as a supplemental fuel in a cement kiln. The waste forge compound solids remaining in the lagoon are currently being removed, packaged, and used as a supplemental solid cement kiln fuel. Standing water has been removed as waste forge compound solids removal occurs. The vadose zone beneath Lagoon No. 1 will be characterized and remedial alternatives such as SVE will be evaluated and implemented, if necessary, based on the characterization results.

The analytical results presented in the RI indicate that the Lagoon No. 1 waste forge compound contained VOCs, primarily TCA (up to 110,000 :g/kg) and its decomposition product 1,1-DCA (up to 3,800 :g/kg)), and metals, with zinc being present at the highest concentration (6,950 mg/kg). PCE was also detected in one sample at 3,600 :g/kg. Tentatively Identified Compounds ("TICs") consisted primarily of hydrocarbons

(nonane, decane, undecane, and dodecane). Toxicity Characteristics Leaching Procedure ("TCLP") analyses for VOCs, SVOCs and metals were performed on Lagoon No. 1 waste forge compound samples and all results were well below the regulatory thresholds for toxicity set forth at 40 CFR 261. The waste forge compound/soil mixture in the lagoon is expected to contain the same types of contaminants as were found in the Lagoon No. 1 waste forge compound.

Samples of waste forge compound and condensate were collected for SVOC and VOC analyses during the 1992 sludge drying study described in the "Waste Forge Compound Treatability Studies Summary Report" (Eder, August 1992). These analytical results are also presented in the RI SVOCs detected in the raw (undried) waste forge compound samples include nanphthalene (19,000 :g/kg), phenanthrene (83,000 :g/kg), anthracene (14,000 :g/kg), fluoranthene (20,000 :g/kg), pyrene (32,000 :g/kg) and chrysene (29,000 :g/kg). The SVOC concentrations detected in the dewatered samples were generally 20 to 40 percent higher than the concentrations in the raw samples. Phenol (9,000 :g/L), benzyl alcohol (5,600 :g/L), 4-methyl pehnol (2,800 :g/L), naphthalene (3,400 :g/L), isophorone (32,000 :g/L), phenanthrene (500 :g/L) and 2-methyl naphthalene (3,400 :g/L) were detected in the condensate samples collected during the test runs. VOC analyses from the drying study yielded results similar to previous analyses of Lagoon No. 1 waste forge compound samples. The ability to achieve lower detection limits for the condensate samples showed the presence of additional VOCs not previously detected in the waste forge compound.

Lagoon No. 1 standing water samples contained 1,1 DCA (3 :g/L), 1,2 DCE (0.2 :g/L), and inorganics, including nickel (46 :g/L) and zinc (98 :g/L).

Melby Road Disposal Site

Waste forge compound was disposed of at the Melby Road Disposal Site from 1966 to 1979 in trenches and apparently by spreading and mixing with soil. During the RI, waste forge compound was found mixed with soil over most of the Melby Road Disposal Site. The RI estimated approximately 53,000 cubic yards ("cy") of soil/waste material in this area. The laboratory analytical results for the test pit and soil boring samples collected in August 1993 were qualified as estimated values because the samples were analyzed outside the recommended technical holding time (within 14 days of sample collection). The highest VOC levels in waste, soil, and soil vapor samples were detected in the central part of the disposed area. TCA was the primary VOC detected, at concentrations ranging from 100 to 88,000 :g/kg, with lower concentrations of TCE, PCE, 1,1-DCA, benzene, toluene, ethyl benzene, and xylenes also present. The materials found in this area include: thin seams of waste forge compound mixed with small amounts of soil; drums containing waste forge compound; and waste forge compound/soil mixture extending to approximately 23 feet below grade. The TCA concentrations in ashy wastes found to a depth of 22 feet at the north-central part of the disposal area were lower (<11 :g/kg), with PCE at 16 :g/kg and total xylenes at 85 :g/kg. The waste forge compound/soil mixtures at the eastern and western portion of the Melby Road Disposal Site were characterized by relatively consistent thicknesses and lower VOC concentrations in the waste and underlying soil.

VOCs either were not detected or were found at low concentrations in samples of the cover material and the native soil beneath the waste at the Melby Road Disposal Site. Portable gas chromatograph screening detected PCE at concentrations ranging from 0.1 to 28.4 ppb in samples collected from the surface down to the water table in three of the 14 borings drilled in August 1993. The VOC concentrations in the soil samples collected from one boring drilled at the central part of the waste disposal area decrease until non-detectable levels are reached 15 to 20 feet below the waste. Portable gas chromatograph screening for three other borings did not detect TCA in soil immediately below the waste, but TCA was detected in samples from depths up to 60 feet below grade. At most other locations, VOCs other than PCE were not detected in soil samples collected more than two feet below the bottom of the waste. Complete analytical results are presented in the RI report.

Fifteen partially crushed drums were removed from the Melby Road Disposal Site during the August 1993 investigation and separated from the other excavated materials. The drums were open-ended and contained waste forge compound. Some of the drums were sheared by the excavator. The drums were overpacked and stored under an overhang on the steel loading dock of Building 102 at the NPI Site. Much of the waste in these drums has been used as a supplemental cement kiln fuel as part of the ongoing Lagoon No. 1 waste forge compound solids removal activity. Any drummed waste that is not a suitable fuel source will be disposed of

at an appropriate off-site facility. The empty drums have been steam cleaned and hauled to a scrap metal dealer for recycling.

East Disposal Site

Remediation of the waste forge compound solids in the East Disposal Site trench is addressed by the Modification to the October 1993 Administrative Order by Consent. Remaining soil/waste materials are estimated to be approximately 1,300 cy. Residual contamination beneath the soil/waste material will be characterized after removal of overlying waste. The need for soil remediation will be evaluated during the implementation phase of the project. The chemical characterization of these materials is described below.

Samples of the waste forge compound/soil mixture from the East Disposal Site trench contained TCE (up to 6,1000 :g/kg), PCE (up to 6,800 :g/kg), TCA (up to 140,000 :g/kg) and hydrocarbons (benzene, toluene, ethyl benzene, and xylenes). Other wastes found at the East Disposal Site consist of construction debris (metal, wood, glass, and concrete); a white powdery material mixed with a black ash-like material; and a red granular material. VOCs including TCE (up to 81,000 :g/kg), TCA (up to 1,500 :g/kg) and PCE (up to 28 :g/kg) were detected in the surficial wastes remaining at this location. PCBs (up to 39 :g/kg) were also detected in one sample at 0-2 feet. A soil vapor survey was conducted in 1989 and the TCE soil vapor concentration contours were used to select additional sampling locations. TCE (up to 1,200 :g/kg), TCA (up to 110 :g/kg), and 1,2-DCE (up to 15 :g/kg) were detected in soil samples from the unsaturated zone. VOC concentrations decrease with depth in the sand and gravel which underlie the wastes. Selected waste samples from the East Disposal Site were subjected to TCLP analysis during the RI. The leachable VOC concentrations were less than the U.S. EPA Toxicity Characteristics ("TC") regulatory levels established in 40 CFR 261. Complete analytical data are presented in the RI report.

Twenty-four drums containing solid wastes were removed from the East Disposal Site in July 1986 and stored under an overhang on the steel loading dock of Building 102 at the NPI Site. The contents of four representative drums (numbers 2, 4, 5, and 16) were sampled and analyzed in 1987. Drum 4 contained the only detectable concentrations of VOCs, with TCE at 4 :g/kg and 1,1,2,2-tetrachloroethane at 13 :g/kg. The SVOC analysis revealed the presence of PAHs in drum 4 and PCBs in drums 2 and 16, respectively. Elevated concentration of arsenic, barium, chromium, lead, nickel, and zinc were also found in the four drums that were sampled. Much of the waste in these drums has been used as supplemental cement kiln fuel as part of the ongoing Lagoon No. 1 waste forge compound solids removal activity. Any drummed waste that is not a suitable fuel source will be disposed of at an appropriate off-site facility. The empty drums have been steam cleaned and hauled to a scrap metal dealer for recycling.

Drainage Ditch 3

Drainage ditches were installed at the NPI Site before 1947 to convey storm water and wastewater from buildings. TCA (up to 48,000 :g/kg), toluene (up to 2,800 :g/kg), and 1,1-DCA (up to 11,000 :g/kg) were detected in the waste forge compound/soil mixture in Drainage Ditch 3. The RI estimated approximately 3,000 cy of waste forge compound/soil mixture in Drainage Ditch 3. The metals concentrations detected were generally above background levels for the NPI Site. Chromium, copper, nickel, and zinc were found in the highest concentrations, in the range of 100 to 500 mg/kg, as compared to background concentrations of about 2 to 10 mg/kg for these metals. Complete analytical data are presented in the RI report.

Dry Wells 2 and 5

Waste streams and storm water were discharged to six dry wells at the NPI Site. The RI estimated approximately 50 cy of contaminated soil and sediment in these dry wells. Contaminants detected in soil adjacent to the bottom of Dry Well 2 include TCA (38 :g/kg), 1,1-DCE (13 :g/kg), and PCBs (960 :g/kg). Contaminants in sediment at the bottom of Dry Well 5 include PAHs (phenanthrene and fluoranthene at 79,000 and 89,000 :g/kg, respectively) and PCBs (14,000 :g/kg). The adjacent soil and bottom sediment samples from these dry wells contained metals at concentrations above background levels for the NPI Site. Chromium (192 mg/kg), lead (32 mg/kg), and zinc (311 mg/kg) were detected in a soil sample adjacent to Dry Well 2, compared to Site background concentrations up to 7.1 mg/kg, 12.6 mg/kg, and 9.3 mg/kg, respectively. The bottom sediment from Dry Well 5 also contained chromium (25 mg/kg), lead (21 mg/kg), and zinc (278 mg/kg) at

concentrations above Site background, as well as copper (483 mg/kg compared to a Site background concentration of 10.4 mg/kg). Complete analytical data are presented in the RI report.

Ground Water

The RI determined that ground-water contamination from the NPI Site is characterized primarily by VOCs. On-site ground water also contains metals (barium, cadmium, chromium, copper, lead, nickel, and zinc) at concentrations above background levels, with concentrations at all but one location below state and federal ground water quality standards. On-site monitoring well MW-10A, located downgradient of Lagoon No. 1, contained cadmium at levels (8 to 36.2 :g/L) higher than the federal Maximum Contaminant Level ("MCL")(5 :g/L), the Wisconsin Enforcement Standard ("ES")(5 :g/L), and the Wisconsin Preventive Action Limit ("PAL")(0.5 :g/L) for ground water. Wisconsin and federal standards for metals are not exceeded at the off-site monitoring wells.

Ground water VOC contamination at and around the NPI Site occurs in four distinct plumes, identified as Plumes 1-2, 3, 4 and 5, as shown on Figure 2. These plumes have been defined and characterized, with each plume delineated by a minimum concentration of 1 :g/L total VOCs. The boundaries of the plumes are defined by the network of monitoring wells installed during the RI. Section 4.0 of the RI report contains the data used to characterize ground water contamination.

Plume 1-2

Plume 1-2 is characterized by the occurrence of TCE, TCA, and 1,1-DCE. However, MCLs were only exceeded for TCE (MCL = 5 :g/L).3 The highest off-site concentration of TCE in Plume 1-2 was 18 :g/L. TCA and 1,1-DCE concentrations were all below MCLs of 200 :g/L and 7 :g/L, respectively. The highest off-site concentrations of TCA and 1,1-DCE were 100 :g/L and 4 :g/L, respectively. The plume extends from the southwestern portion of the NPI Site to the ECMWF, having a maximum width of approximately 1,700 feet and a length of 15,000 feet (measured along its axis). As discussed earlier, a two-column air stripper was placed in service in August 1987 to treat contaminated ground water at the ECMWF prior to its introduction into the City of Eau Claire's water treatment and distribution system. This stripper continues to treat contaminated ground water extracted at the leading edge of Plume 1-2. Monitoring wells were installed during the RI to track ground water in Plume 1-2 along its path from the NPI Site to the ECMWF.

Plumes 3, 4 and 5

Plume 3 contains TCA, 1,1-DCE, and PCE, and extends approximately 9,000 feet from the Melby Road Disposal Site to Lake Hallie to the north, having a maximum width of 1,500 feet. Off-site concentrations of TCA, 1,1-DCE, and PCE do not exceed MCLs. Plume 4 is entirely off-site, overlaps a portion of Plume 3 north of the NPI Site and is characterized primarily by TCE. MCLs were only exceeded for TCE. The highest concentration of TCE found in Plume 4 was 14 :g/L. Plume 5 also consists primarily of TCE and extends approximately 6,500 feet from the East Disposal Site to Lake Hallie, having a maximum width of approximately 1,000 feet. No MCLs are exceeded in Plume 5; however, the MCL of 5 :g/L for TCE is attained. Ground water in Plumes 3, 4, and 5 discharges to Lake Hallie. Surface-water samples taken during the RI showed maximum TCA and TCE concentrations of 1 :g/L and 3 :g/L, respectively. The concentrations of TCA and TCE found in the surface-water samples were well below U.S. EPA's ambient water quality criterion and Wisconsin's surface water quality standards.

VI. SUMMARY OF SITE RISKS

CERCLA requires that U.S. EPA protect human health and the environment from current and potential exposure to releases of hazardous substances at or from the Site. As part of the RI, a Baseline Risk Assessment is required to assess the current and potential future risks by the Site. The Baseline Risk Assessment determines whether contamination at the Site could pose an unacceptable health risk or environmental risk in the absence of any remedial action. Potential threats to public health are estimated by making assumptions about the manner, frequency and length of time a person could be exposed to site-related contaminants.

3 MCLs are numerically equivalent to ESs, so all references to MCL exceedances in this ROD also indicate an ES exceedance.

The Baseline Risk Assessment (Weston, July 1993) evaluated current and future potential human health or environmental risks associated with the NPI Site. The qualitative risk assessment examined contaminants detected in ground water and soils during the field investigation phase of the RI. These contaminants were evaluated with respect to their carcinogenicity, toxicity, and possible exposure pathways from and at the Site.

All chemicals identified in all Site media were evaluated: soil, ground water, surface water, sediments, and waste materials. Each sample was assessed by evaluating data qualifiers and blank sample concentrations. Upon screening each sample, the following list of chemicals of potential concern was developed:

Volatile Organic Compounds	Semi-volatile Organic Compounds	Inorganics
Acetone	1,2-Dichlorobenzene	Aluminum
Methylene Chloride	Naphthalene	Antimony
1,1-Dichloroethene	2-Methyl naphthalene	Arsenic
1,1-Dichloroethane	Acenaphthylene	Barium
1,2-Dichloroethene (total)	Acenaphthene	Cadmium
2-Butanone	Dibenzofuran	Calcium
1,1,1-Trichloroethane	Fluorene	Chromium
Trichloroethene	Phenanthrene	Copper
Benzene	Anthracene	Iron
Tetrachloroethene	Fluoranthene	Lead
Toluene	Pyrene	Magnesium
Ethyl benzene	Benzo(a)anthracene	Manganese
Xylenes (total)	Chrysene	Nickel
	Benzo(b)fluoranthene	Potassium
	Benzo(a)pyrene	Selenium
		Silver
		Sodium
		Vanadium
		Zinc

VOCs and/or inorganic compounds were detected in samples of soil, waste material, and ground water. VOCs were detected in surface water samples. SVOCs (PAH compounds) were detected in the Lagoon No. 1 waste forge compound.

The exposure assessment described site-specific characteristics prior to any cleanup activity at the Site, including: soils, geology, surface water, ground water, climate, demographics, and land and water use. The on-site and off-site potentially exposed populations were identified. Each of the chemicals of potential concern was evaluated in terms of its fate and transport properties. This evaluation identified the environmental compartment (i.e. air, water or soil) to which each chemical would tend to migrate.

The following exposure scenarios were identified and evaluated in the Baseline Risk Assessment:

Current Off-Site Residents (Adult and Child)

- Ingestion of soil
- Dermal Absorption of soil
- Inhalation of dust

Future On-Site Residents (Adult and Child)

- Ingestion of soil and ground water
- Dermal Absorption of ground water
- Inhalation of vapors from ground water

Current Off-Site Recreational (Adult and Child)

Ingestion of water while swimming
Dermal Absorption of water while swimming
Consumption of recreationally caught fish

Current On-Site Worker

Ingestion of soil
Dermal Absorption of soil
Inhalation of dust

The available health effects criteria for each chemical of potential concern were identified. Known or suspected carcinogens and non-carcinogens were addressed independently.
The risk characterization integrates the exposure and toxicity assessments into a measurable expression of risk for each exposure scenario. The cancer risk is expressed as a probability of a person developing cancer over the course of his or her lifetime. According to the National Contingency Plan ("NCP"), a cancer risk of 1.0E-06, which represents one additional occurrence of cancer in one million people, is considered a reference level for evaluating acceptable risk.

The non-carcinogenic risk is presented as a hazard index. A hazard index greater than one indicates that there may be a concern for potential health effects resulting from exposure to non-carcinogens. The total carcinogenic and non-carcinogenic risks calculated for each receptor and exposure pathway evaluated in the Baseline Risk Assessment are presented in Table 1.

The carcinogenic risk and non-carcinogenic hazard to current off-site residents (adult and child) from exposure to off-site soil were calculated. The total non-carcinogenic hazard indices for an adult ranges from 9.7E-03 to 1.4E-02. The total non-carcinogenic hazard indices for a child ranges from 8.9E-02 to 1.3E-01. The Baseline Risk Assessment indicates that adverse non-carcinogenic health effects are not expected under this exposure scenario. The adult and child exposure scenario risks were calculated; the total excess cancer risk ranged from 8.4E-07 to 3.7E-06. A large portion of the total cancer risk was attributed to ingestion of arsenic in the soil. The Baseline Risk Assessment reports that the risk associated with this pathway is likely overestimated by one to two orders of magnitude due to the uncertainty associated with the toxicological data available for arsenic.

The potential future cancer risk and hazard was evaluated for on-site residents (adult and a child) due to exposure to on-site soil and ground water. The Baseline Risk Assessment indicates that the calculated carcinogenic and non-carcinogenic health threats are potentially significant under this scenario. The non-carcinogenic hazard indices for an adult ranged from 1.2 to 2.6. The hazard indices for a child range from 3.4 to 6.6. The majority of this health risk (>85%) was associated with exposure to the ground water. For the ground water exposure pathway, the majority of the noncarcinogenic risk was attributed to the ingestion of antimony and arsenic in the drinking water. Although the majority of the risk was due to ingestion of arsenic in drinking water, the risks associated with exposure to several VOCs (1,1-DCE, TCE and PCE) also exceeded 1.0E-06. The total cancer risk (i.e., for soil and ground-water exposure combined) ranged from 6.0E-05 to 3.8E-04. The majority of the cancer risk is associated with exposure to on-site soils, of which more than 99% of the risk is due to exposure to carcinogenic PAHs. It is noteworthy that the Baseline Risk Assessment states that this future residential exposure scenario is unlikely, and that the methods used to determine the associated health risks were conservative.

For current recreational exposure to contaminants in Lake Hallie, both carcinogenic and non-carcinogenic health risks were found to be insignificant.

The current risk and hazard to workers at the NPI Site due to exposure to chemicals of potential concern were calculated. The Baseline Risk Assessment indicates that the health risks posed by worker exposure to non-carcinogens at the NPI Site were insignificant. The total excess cancer risk for workers ranged from 4.4E-06 to 5.4E-05. The major contributors to the risk are PAHs. The Baseline Risk Assessment states that conservative methods were used to determine the associated health risks and that actual risks are expected to

be less than the calculated values.

Based on the qualitative analyses, the ecological risks associated with exposure of the terrestrial, aquatic and avian species to contaminants at the NPI Site are within a range acceptable under U.S. EPA guidance and regulations.

The primary risks remaining at the NPI Site relate to the potential for the continued contamination of ground water. In order to provide for the long term protection and cleanup of the ground water, source control measures must be implemented. Even though the interim action pump and treat systems currently prevent the off-site migration of contaminated ground water, source areas at the NPI Site must be contained or eliminated in order to facilitate the long-term cleanup of the aquifer.

VII. DESCRIPTION OF ALTERNATIVES

The alternative evaluated in the FS are consistent with the previous cleanup phases already undertaken at the NPI Site. Prior actions at the Site include: the installation of a two-column air stripper at the ECMWF; the extension of municipal water service from the City of Eau Claire to private well users in areas affected by Plume 1-2; installation of permanent alternate drinking water supplies for areas of private well contamination near the NPI Site; and installation of the on-site ground-water interim remedial action. The interim remedial action consists of continuous ground-water extraction at the Melby Road Disposal Site and the southwestern portion of the NPI Site with treatment and discharge of the extracted ground water to the Chippewa River via the City of Eau Claire storm sewer system.

The FS identified and evaluated cleanup alternatives that could be used to address threats and/or potential threats posed by the NPI Site. The alternatives were divided into source control alternatives and ground-water cleanup alternatives. The source control alternatives were designed to reduce or eliminate direct contact human health risks and prevent additional ground-water contamination. An overall source control remedy for the NPI Site combines several alternatives, each applicable to a specific area and material type. The ground-water cleanup alternatives were designed to address the existing ground-water contamination at the four plumes of VOCs to attain the long-term goal of reducing the VOC concentrations to PALs. The following section briefly describes the alternatives considered by U.S. EPA in the process of determining a final cleanup remedy for NPI Site. The alternatives U.S. EPA has selected as part of the final remedy are highlighted with a large asterisk.

SOURCE CONTROL ALTERNATIVES

Alternatives have been developed to address the four sources areas: Melby Road and East Disposal Sites, Drainage Ditch 3 and Dry Wells 2 and 5.

MELBY ROAD and EAST DISPOSAL SITES

The alternatives evaluated for addressing the contaminated soils at the Melby Road and East Disposal Sites are:

Alternative M-A - No Action

Capital Cost:	$0
Annual Operation and Maintenance (O&M) Cost:	$0
Present Worth (30 Year):	$0
Estimated Construction Time Frame	None

The inclusion of the No-Action alternative is required by law to give U.S. EPA a basis for comparison. Under the No-Action alternative, source control measures at the Melby Road and East Disposal Sites would not be implemented. This alternative would not effectively reduce threats to human health and the environment posed by the Melby Road and East Disposal Sites.

*Alternative M-B1 - Soil Vapor Extraction, Hotspot Removal at Melby Road, Excavation and Consolidation of

East Disposal Site Wastes and Multi-Layer Cap over Combined Wastes at the Melby Road Disposal Site

Capital Cost:	$2,890,000
Annual O&M Cost:	$78,500
Present Worth (30 Year) Cost:	$3,900,000
Estimated Construction Time Frame:	two years

This alternative consists of installing a soil vapor extraction ("SVE") system at the Melby Road Disposal Site; removing areas of concentrated waste materials ("hotspots"), if any, identified by the SVE system; excavating approximately 1,300 cy of waste forge compound mixed with soil identified at the East Disposal Site; combining these wastes with the wastes at the Melby Road Disposal Site; and, finally installing a multi-layer cap compliant with Wisconsin Administrative Code Chapter NR 660 over all of the waste materials.

The SVE system would be installed and monitored before the installation of the cap in order to identify the location of possible hotspots at the Melby Road Disposal Site. These concentrated waste materials would be excavated and disposed of in an off-site disposal facility. This hotspot removal approach would reduce the possibility that future waste removal would be required after the cap is installed. The objective of the SVE system would be to prevent future releases of VOCs into the ground water. A soil gas monitoring program would be implemented to monitor the effectiveness of the SVE system in removing VOCs.

A multi-layer cap compliant with NR 660 would eliminate the potential for direct human contact with wastes and would reduce leachate generation at the NPI Site. A typical cap consists of a synthetic, plastic membrane over a 2-foot-thick soil layer, a 1-foot-thick sand drainage layer, and an approximately 2-foot-thick topsoil layer. The topsoil layer would be seeded so that it would eventually be covered with grass. A ground-water monitoring program would be implemented upgradient and downgradient of the capped areas to monitor the effectiveness of the caps in reducing contaminant migration to ground water. The effectiveness of the cap would be tracked via a long-term ground-water monitoring system. U.S. EPA would seek deed restrictions limiting land use in the future development of the capped area.

Alternative M-B2 - Soil Vapor Extraction, Hotspot Removal at Melby Road and Multi-Layer Cap over contaminated soils at each of the Melby Road and East Disposal Sites

Capital Cost:	$3,040,000
Annual O&M Cost:	$130,000
Present Worth (30 Year) Cost:	$4,700,000
Estimated Construction Time Frame:	two years

This alternative is similar to Alternative M-B1 except that the waste forge compound soil mixture at the East Disposal Site would not be excavated and combined with the waste materials at Melby Road. Instead, a separate SVE system and multi-layer cap compliant with NR 660 would be installed at the East Disposal Site in addition to the SVE system and multi-layer cap at the Melby Road Disposal Site.

Alternative M-C1 - Partial Source Removal from Melby Road to On-Site Landfill, Multi-Layer Cap over remaining contaminated soils with Soil Vapor Extraction at the Melby Road and East Disposal Sites

Capital Cost:	$5,150,000
Annual O&M Cost:	$130,000
Present Worth (30 Year) Cost:	$7,040,000
Estimated Construction Time Frame:	two years

Under a partial removal at the Melby Road Disposal Site, all visibly impacted waste materials within the area defined by the RI soil vapor survey, approximately 14,000 cy, would be removed and disposed of in an on-site

hazardous waste landfill compliant with NR 660 requirements. As described in Alternative M-B2, SVE systems and multi-layer caps would be installed at the Melby Road and East Disposal Sites to cover wastes that remain in place.

Alternative M-C2 - Partial Source Removal from Melby Road to Off-Site Landfill, Multi-Layer Cap over remaining contaminated soils with Soil Vapor Extraction at the Melby Road and East Disposal Sites

Capital Cost:	$8,300,000
Annual O&M Cost:	$130,000
Present Worth (30 Year) Cost:	$9,950,000
Estimated Construction Time Frame:	15 months

This alternative is the same as Alternative M-C1 except that the visibly impacted waste materials at the Melby Road Disposal Site would be disposed of in an off-site hazardous waste landfill. As described in Alternative M-C1, wastes that remain in place under the partial removal scenario would be capped and an SVE system would be installed at the Melby Road and East Disposal Sites.

Alternative M-D1 - Source Removal to On-Site Landfill

Capital Cost:	$7,600,000
Annual O&M Cost:	$71,500
Present Worth (30 Year) Cost:	$8,500,000
Estimated Construction Time Frame:	two years

This alternative consists of excavating approximately 53,000 cy and 1,300 cy of waste forge compound mixed with soil from the Melby Road and East Disposal Sites, respectively, and disposing of these wastes in a single on-site hazardous waste landfill compliant with NR 660 requirements. The waste forge compound may need treatment (solidification)4 prior to disposal. Construction debris would be separated from the waste forge compound and would be disposed of in an on-site landfill or at a licensed construction and demolition landfill. Under this source removal alternative, all visibly contaminated waste materials would be excavated and disposed of in an on-site hazardous waste landfill. The FS assumed that the landfill could be constructed at Lagoon No. 2; the actual landfill location would be selected during the upcoming design phase. The landfill would be constructed according to federal and state hazardous waste requirements. A ground-water monitoring program would be implemented to track water quality upgradient and downgradient of the landfill. Post excavation samples will be collected to determine if any contamination remains in the soil that will require cleanup. U.S. EPA would seek deed restrictions limiting land use in the future development of the on-site landfill.

Contamination remaining in the soil after removal of overlying waste would be evaluated based on post-excavation sampling results. Additional cleanup such as an SVE system will be installed if any remaining contamination would cause ground-water standards to be exceeded.

Alternative M-D2 - Source Removal to Off-Site Landfill

Capital Cost:	$21,500,000
Annual O&M Cost:	$0
Present Worth (30 Year) Cost:	$21,500,000
Estimated Construction Time Frame:	one year

This alternative is the same as Alternative M-D1 except that the waste forge compound/soil mixture at the Melby Road and East Disposal Sites would be disposed of in an off-site hazardous waste landfill.

Alternative M-E - Source Removal with On-Site Low Temperature Thermal Desorption; and On-Site or Off-Site

Disposal of Treated Materials

Capital Cost:	$23,870,000 to $37,790,000
Annual O&M Cost:	$71,500 to $0
Present Worth (30 Year) Cost:	$24,760,000 to $37,790,000
Estimated Construction Time Frame:	two to three years

4 Solidification would involve adding absorbent chemicals to the excavated material to remove any liquids.

This alternative consists of excavating approximately 53,000 cy and 1,300 cy of waste forge compound mixed with soil from the Melby Road and East Disposal Sites, respectively, and treating these materials in a low-temperature thermal desorption ("LTTD") system at the NPI Site, then disposing of the treated waste materials in an on-site or off-site hazardous waste landfill compliant with NR 660. An LTTD system removes VOCs from waste materials by heating them in a large rotary dryer.

Alternative M-F - Source Removal with On-Site Incineration; and On-Site or Off-Site Disposal of Residual Ash

Capital Cost:	$53,470,000 to $64,090,000
Annual O&M:	$71,500 to $0
Present Worth (30 Year) Cost:	$54,360,000 to $64,090,000
Estimated Construction Time Frame:	two to three years

This alternative involves excavating approximately 53,000 cy and 1,300 cy of waste forge compound mixed with soil from the Melby Road and East Disposal Sites, respectively, incinerating waste materials in an on-site treatment unit to destroy organic contaminants and disposing of the ash in an on-site or off-site, solid or hazardous waste landfill, based on testing results. The location of the incineration unit would be determined when the cleanup project is designed. Additional treatment (solidification) may be required to immobilize inorganic compounds before the ash could be disposed of in an on-site or off-site landfill.

DRAINAGE DITCH 3

The alternatives evaluated for addressing the contaminated soils in Drainage Ditch No. 3 are:

Alternative D-A - No Action

Capital Cost:	$0
Annual O&M Cost:	$0
Present Worth (30 Year) Cost:	$0
Estimated Construction Time Frame:	None

Under the No-Action alternative, source control measures for Drainage Ditch 3 would not be implemented. This alternative would not effectively reduce threats to human health and the environment posed by Drainage Ditch 3.

*Alternative D-B - Source Removal and Consolidation with Wastes at Melby Road Disposal Site

Capital Cost:	$220,000
Annual O&M Cost:	$0
Present Worth (30 Year) Cost:	$220,000
Estimated Construction Time Frame:	three months

This alternative consists of excavating approximately 3,999 cy of soil mixed with small quantities of waste forge compound, treating such wastes (if necessary) and consolidating these wastes with those at the Melby Road Disposal Site. This alternative would be implemented in conjunction with Alternative M-B1.

Alternative D-C1 - Source Removal to On-Site Landfill

Capital Cost:	$827,000
Annual O&M Cost:	$3,500
Present Worth (30 Year) Cost:	$871,000
Estimated Construction Time Frame:	one year

This alternative consists of excavating approximately 3,000 cy of soil mixed with small quantities of waste forge compound, treating such wastes (if necessary) and disposing of these wastes in an on-site hazardous waste landfill compliant with NR 660 requirements. The on-site landfill would be constructed as described in Alternative M-D1.

Alternative D-C2 - Source Removal to Off-Site Landfill

Capital Cost:	$1,153,000
Annual O&M Cost:	$0
Present Worth (30 Year) Cost:	$1,200,000
Estimated Construction Time Frame:	three months

This alternative is the same as Alternative D-C1 except that the soil mixed with small quantities of waste forge compound would be disposed of in an off-site hazardous waste landfill.

Alternative D-D - Source Removal with On-Site Low Temperature Thermal Desorption; and On-Site or Off-Site Disposal of Treated Materials

Capital Cost:	$1,790,000 to $2,120,000
Annual O&M Cost:	$3,500 to $0
Present Worth (30 Year) Cost:	$1,840,000 to $2,120,000
Estimated Construction Time Frame:	two to three years

This alternative consists of excavating approximately 3,000 cy of soil mixed with small quantities of waste forge compound from Drainage Ditch 3 and treating these wastes in an LTTD system at the NPI Site. The treated waste material would be stockpiled, analyzed, solidified, if necessary, and disposed of in an on-site or off-site hazardous waste landfill compliant with NR 660 regulations.

Alternative D-E - Source Removal with On-Site Incineration; and On-Site or Off-Site Disposal of Residual Ash

Capital Cost:	$3,040,000 to $3,590,000
Annual O&M Cost:	$0 to $3,500
Present Worth (30 Year) Cost:	$3,040,000 to $3,590,000
Estimated Construction Time Frame:	two to three years

This alternative consists of excavating approximately 3,000 cy of soil mixed with small quantities of waste forge compound from Drainage Ditch 3 and incinerating these wastes in an on-site treatment unit to destroy organic contaminants. The resulting ash would be stockpiled, analyzed, and solidified, if necessary, and disposed of in an on-site or off-site, solid or hazardous waste landfill, based on testing results.

DRY WELLS 2 and 5

The alternatives evaluated for addressing the contaminated soils in Dry Wells 2 and 5 are:

Alternative W-A - No Action

Capital Cost:	$0
Annual O&M Cost:	$0
Present Worth (30 Year) Cost:	$0
Estimated Construction Time Frame:	None

Under the No-Action alternative, source control measures would not be implemented at Dry Wells 2 and 5. This alternative would not effectively reduce threats to human health and the environment posed by Dry Wells 2 and 5.

*Alternative W-B - Complete Source Removal to Off-Site Landfill

Capital Cost:	$41,000
Annual O&M Cost:	$0
Present Worth (30 Year) Cost:	$41,000
Estimated Construction Time Frame:	three months

This alternative consists of excavating approximately 50 cy of contaminated soils and sediments at Dry Wells 2 and 5, treating these materials (if necessary), and disposing of these wastes in an off-site hazardous waste landfill. Based on the concentrations of PCBs detected in these materials during the RI, these wastes would need to be disposed of at a facility licensed to accept PCB-contaminated wastes. Disposal at the on-site landfill is not feasible because of the type of contaminants (including PCBs and metals) detected in these materials.

GROUND-WATER CLEANUP ALTERNATIVES

Alternatives have been developed to address the four VOC plumes attributed to sources at the NPI Site. These plumes are identified as Plumes 1-2, 3, 4, and 5. U.S. EPA has determined that the effectiveness of the ground-water alternatives at the NPI Site depends largely on source control. Therefore, each ground-water alternative assumes that source control measures are being implemented at the NPI Site and the on-site ground-water interim action (cascade aeration) continues to effectively prevent off-site migration of contaminated ground water from the Melby Road Disposal Site and the Lagoon No. 1 - Drainage Ditch 3 Area. Each ground-water alternative further assumes continued operation of the ECMWF air stripper until such time that ground-water Applicable or Relevant and Appropriate Requirements ("ARARs") are achieved.

PLUME 1-2

The alternatives evaluated for addressing Plume 1-2 are:

*Alternative GW1-A - No Further Action with Contingency (Continued Operation of the ECMWF Air Stripper, Continued Operation of the On-Site Pump and Treat Systems, and Long-Term Ground-Water Monitoring with Contingency)

Capital Cost:	$0
Annual O&M Cost:	$59,000
Present Worth (30 Year) Cost:	$730,000
Estimated Construction Time Frame:	None

For Plume 1-2, this alternative is called "No Further Action with Contingency" because several remedial actions have already been implemented and a contingency is included in case future actions are necessary. Remedial actions to date include: (1) an air stripper at the ECMWF which currently treats 6 to 7 million gallons of water daily; (2) an on-site interim action pump and treat system initiated in March 1994 which currently prevents the off-site migration of contaminants in Plume 1-2; and (3) the on-going cleanup work at Lagoon No. 1 as provided for in the October 1993 Administrative Order by Consent between U.S. EPA and NPI.

A ground-water study estimated that the existing ECMWF and on-site interim pump and treat system would restore the off-site portion of the contaminated aquifer to meet PALs in about 160 years.

This study utilized a retardation factor of five, thereby assuming that the aquifer would require five complete flushes to achieve PALs.

U.S. EPA will evaluate the effectiveness of the selected remedy as part of the 5-year review process for sites where wastes are left on site. If the data available at the first such review is insufficient for

a reliable trend analysis, evaluation of remedy performance will be completed in the subsequent review or at some earlier time to be established during the initial 5-year review. An evaluation of ground-water information gathered for each 5-year review will be used to determine whether or not there is a need for additional actions to reduce cleanup times. The 5-year reviews would also evaluate the technical impracticability of attaining PALs in the ground water. If U.S. EPA determines that it is technically impracticable to achieve PALs, a Technical Impracticability ARAR waiver under CERCLA may be granted for the Site. To the extent U.S. EPA's 5-year reviews indicate that it is not technically or economically feasible to achieve PALs, NR 140.28 provides substantive standards for granting exemptions from the requirement to achieve PALs. Such exemption levels may not be higher than the Wisconsin ESs.

The ground-water cleanup goals (which must also be achieved within a reasonable period of time) for the contaminants of concern are the PALs. However, the determination of whether additional measures will be required for Plume 1-2 will be based on compliance/projected compliance with the ESs within a reasonable period of time. For this type of situation, a reasonable period of time for meeting the ESs (MCLs) can be defined as less than 30 years.

At each 5-year review or earlier, as necessary, U.S. EPA, in consultation with WDNR, will evaluate the following criteria in order to determine the need for additional remedial measures:

1. Comparison of existing contaminant levels throughout the plume to ESs (MCLs);

2. Trends in contaminant concentrations, if any;

3. Effectiveness of the interim pump and treat system/location, in conjunction with other source control measures, at cutting off the source of contamination at the NPI Site from the downgradient off-site Plume 1-2;

4. Ability to improve the current interim pump and treat system to provide greater effectiveness in cleaning up the downgradient plume;

5. Potential reduction in restoration timeframes to less than 30 years for ESs;

6. Potential for the contaminants in the ground water to reach asymptotic levels throughout the plume;

7. Negative impacts on the municipal water supply; and

8. Alternative remedial measures available to meet ground-water standards and the cost thereof.

Additional measures will be necessary if an evaluation of the above criteria indicates: (1) concentrations within Plume 1-2 have not decreased; (2) concentrations within Plume 1-2 do not show the potential to decrease below ESs in less that 30 years; or (3) interim pump and treat systems, in conjunction with other source control measures, do not meet their remedial objectives of preventing off-site contaminant migration.

Long term ground-water monitoring would be conducted to monitor and insure the effectiveness of this alternative. Ground-water monitoring results will be evaluated annually to aid in predicting contaminant trends. A ground-water monitoring program to be developed during the design phase shall include but not be limited to: development of a continuous monitoring record; identification of select wells throughout the plume to monitor changes in both the horizontal and vertical extent of the plume; sampling frequency; and identification and monitoring of areas containing higher contaminant concentrations, if any.

If additional measures are determined to be necessary, they are likely to involve revised pump and treat design or other remedial measures, including any applicable new technology. The applicability of new technologies will be evaluated in terms of technical and economic feasibility. The design of additional measures (should they be necessary) will include: locating extraction wells (or other remedies) to maximize hydraulic capture of the plume; minimizing the impact on the municipal well field in terms of both quantity and quality; and considering areas of greater contaminant concentrations, if any.

This alternative includes any measures required to ensure the continued effectiveness of the ECMWF air stripper and the long-term operation and maintenance thereof.

Alternative GW1-B - Pump and Treat by Cascade Aeration

Capital Cost:	$550,000 to $1,270,000
Annual O&M Cost:	$129,000 to $499,000
Present Worth (30 Year) Cost:	$2,300,000 to $4,300,000
Estimated Construction Time Frame:	one to two years

Under this alternative, the off-site ground water in Plume 1-2 would be pumped to reduce the time required to capture the plume and clean up the aquifer. The ground-water study estimated that one to two additional pump and treat systems would restore the off-site portion of the aquifer to meet PALs in about 60 to 80 years. Water pumped from the new extraction wells would be treated by cascade aeration and discharged to the Chippewa River through the City of Eau Claire storm sewer system or discharged directly to the Chippewa River. Cascade aeration systems are currently being used at the NPI Site as part of the on-site interim action required in the 1991 ROD. Long-term, ground-water monitoring would be conducted to insure the effectiveness of this alternative. The effect of this alternative on the City of Eau Claire's water supply was not evaluated.

Alternative GW1-C - Pump and Treat by Air Stripping

Capital Cost:	$737,000 to $1,800,000
Annual O&M Cost:	$173,000 to $585,000
Present Worth (30 Year) Cost:	$2,900,000 to $5,900,000
Estimated Construction Time Frame:	one to two years

This alternative is similar to Alternative GW1-B except that the ground water would be treated by air stripping (instead of cascade aeration) and discharged to the Chippewa River through the City of Eau Claire storm sewer system, directly to the Chippewa River, or to recharge basins (areas where treated ground water would trickle through the soils to ground water). Long-term, ground-water monitoring and discharge water sampling would be conducted to insure the effectiveness of this alternative.

PLUMES 3 AND 4

The alternatives evaluated for addressing Plumes 3 and 4 are:

*Alternative GW3-A - No Further Action (Continued Operation of the On-Site Pump and Treat Systems, and Long-Term Ground-Water and Surface-Water Monitoring)

Capital Cost:	$0
Annual O&M Cost:	$62,000
Present Worth (30 Year) Cost:	$764,000
Estimated Construction Time Frame:	None

For Plumes 3 and 4, this alternative can be called "No Further Action" because significant cleanup work has already been done at Plumes 3 and 4. This work includes the construction of a permanent alternative drinking water supply for the area affected by Plumes 3 and 4, in accordance with the August 1990 ROD. Additionally, under the 1990 ROD, 42 private wells in the affected area were abandoned after residences and businesses were connected to the City of Eau Claire water supply. Institutional controls are in effect to prevent area residences and businesses from using wells in the area for drinking water: Residences in the area supplied with municipal water are allowed to use private wells for other purposes, such as irrigation and car washing, as long as there is no connection to indoor plumbing. To use these wells, property owners must submit applications for annual permits to the Hallie Sanitary District.

In addition, U.S. EPA issued a ROD in September 1991 which selected an interim action pump and treat system to prevent the off-site movement of contaminants in Plume 3. This pump and treat system began operating in

March 1994. The interim action pump and treat system does not include Plume 4 because this plume is entirely off site. Ground water in Plumes 3 and 4 downgradient of the interim pump and treat system continues to discharge to Lake Hallie where the levels of VOCs detected in water samples collected during the RI were below Wisconsin surface water quality standards.

The ground-water study conducted as part of the RI estimated that the no-further-action alternative would restore the off-site portion of the aquifer to meet PALs in about 120 years. As previously indicated, this study assumed that five complete flushes of the aquifer would achieve PALs. Long-term, ground-water and surface-water monitoring would be conducted to monitor and insure the effectiveness of the no-further-action alternative. A final ground-water monitoring program would be developed during the design phase. Surface-water monitoring would also be performed to track contaminant levels in Lake Hallie to confirm that the lake is not affected by ground-water discharge from Plumes 3 and 4.

Alternative GW3-B - Pump and Treat by Cascade Aeration

Capital Cost:	$760,000 to $1,220,000
Annual O&M Cost:	$188,000 to $653,000
Present Worth (30 Year) Cost:	$3,200,000 to $5,000,000
Estimated Construction Time Frame:	one to two years

Under this alternative, ground water would be pumped for the off-site portion of Plumes 3 and 4 to reduce the time required to capture the plume and clean up the aquifer. The ground-water study estimated that one to two additional pump and treat systems would restore the off-site portion of the aquifer to meet PALs in about 35 to 40 years. Water pumped from the new extraction wells would be treated by cascade aeration and discharged to the Chippewa River through the City of Eau Claire storm sewer system or discharged directly to the Chippewa River. Long-term, ground-water monitoring and discharge water sampling would be conducted to insure the effectiveness of this alternative. Surface-water monitoring would also be performed to track contaminant levels in Lake Hallie to confirm that the lake is not affected by ground-water discharge from Plumes 3 and 4.

Alternative GW-C - Pump and Treat by Air Stripping

Capital Cost:	$999,000 to $1,680,000
Annual O&M Cost:	$216,000 to $732,000
Present Worth (30 Year) Cost:	$3,900,00 to $6,400,000
Estimated Construction Time Frame:	one to two years

This alternative is similar to Alternative GW3-B except that the water pumped from new extraction wells would be treated by air stripping (instead of cascade aeration) and discharged to the Chippewa River through the City of Eau Claire storm sewer system, directly to the Chippewa River, or to recharge basins. Long-term, ground-water monitoring and discharge water sampling would be conducted to insure the effectiveness of this alternative. Surface-water monitoring would also be performed to track contaminant levels in Lake Hallie to confirm that the lake is not affected by ground-water discharge from Plumes 3 and 4.

PLUME 5

The alternatives evaluated for addressing Plume 5 are:

*Alternative GW5-A - No Further Action (Continued Operation of the On-Site Pump and Treat Systems, and Long-Term Ground-Water and Surface-Water Monitoring)

Capital Cost:	$123,000
Annual O&M Cost:	$62,000
Present Worth (30 Year) Cost:	$887,000
Estimated Construction Time Frame:	None

This alternative can be called "No Further Action" because significant work has already been done at Plume 5 to eliminate the ground water exposure pathway. Similar to the work performed for Plumes 3 and 4, a permanent alternative drinking water supply was constructed for the area affected by Plume 5 in accordance with the August 1990 ROD. Although PALs were exceeded in Plume 5, an interim pump and treat system using cascade aeration was not installed for this plume because Wisconsin ESs and federal MCLs were not exceeded here. The VOC concentrations in Plume 5 and in Lake Hallie water samples collected during the RI are below Wisconsin surface water quality standards. The ground-water study estimated that the no-further-action alternative would restore the aquifer to meet PALs in about 110 years.

The no-further-action alternative for Plume 5 would include long-term ground-water and surface-water monitoring to insure the effectiveness of this alternative. A final ground-water and surface-water monitoring program would be developed during the design phase.

Alternative GW5-B - Pump and Treat by Cascade Aeration

Capital Cost:	$819,000 to $848,000
Annual O&M Cost:	$169,000 to $441,000
Present Worth (30 Year) Cost:	$3,200,000
Estimated Construction Time Frame:	one to two years

Under this alternative, ground water would be pumped for the off-site portion of Plume 5 to reduce the time required to capture the plume and clean up the aquifer. The ground-water study estimated that one additional pump and treat system would restore the aquifer to meet PALs in about 60 years.

Water pumped from the new extraction wells would be treated by cascade aeration and discharged to the Chippewa River through the City of Eau Claire storm sewer system or discharged directly to the Chippewa River. Long-term ground-water and surface-water monitoring as well as discharge water sampling would be conducted to insure the effectiveness of this alternative.

Alternative GW5-C - Pump and Treat by Air Stripping

Capital Cost:	$958,000
Annual O&M Cost:	$193,000 to $470,000
Present Worth (30 Year) Cost:	$3,600,000 to $3,800,000
Estimated Construction Time Frame:	one to two years

This alternative is similar to Alternative GW5-B except that the water pumped from new extraction wells would be treated by air stripping (instead of cascade aeration) and discharged to the Chippewa River through the City of Eau Claire storm sewer system, directly to the Chippewa River, or to recharge basins. Long-term, ground-water and surface-water monitoring as well as discharge water sampling would be conducted to insure the effectiveness of this alternative.

VIII. SUMMARY OF COMPARATIVE ANALYSIS OF ALTERNATIVES

The following nine criteria, outlined in the NCP at 40 CFR 300.430(e)(9)(iii), were used to compare the alternatives and to determine the alternative for remediation of the soils and ground-water contamination that: (1) is protective of human health and the environment; (2) attains ARARs; (3) is cost effective; and (4) represents the best balance among the evaluating criteria. The alternative that meets the two "threshold" requirements of protectiveness and ARAR-compliance, and provides the "best balance" of trade-offs, with respect to the remaining criteria, is determined from this evaluation.

A. THRESHOLD CRITERIA

OVERALL PROTECTION OF PUBLIC HEALTH AND THE ENVIRONMENT addresses whether a remedy provides adequate protection of human health and the environment and describes how risks posed by each exposure pathway are eliminated, reduced, or controlled through treatment, engineering controls, or institutional controls.

Source Control Alternatives

Melby Road and East Disposal Site

All Melby Road and East Disposal Site alternatives, with the exception of the No-Action Alternative, would provide adequate protection to human health and the environment by eliminating exposure to contaminated soil at the Site and preventing the migration of contaminants into the ground water. On-site ground-water treatment systems currently prevent the off-site migration of contaminated ground water. Alternative M-B1, M-B2, M-C1, M-C2, and M-D1 would all cap and/or landfill the wastes on site. Capping and/or lakefilling would eliminate human health risks posed by direct contact with contaminated soils by preventing exposure. For alternative M-B1, waste materials from the East Disposal Site would be excavated and consolidated at the Melby Road Site for capping. This option would create a single area for management of waste materials at the NPI Site. Capping and/or landfilling also reduces the potential for further contamination of on-site ground water by minimizing the infiltration of rainwater through contaminants and into ground water. In conjunction with the multi-layer cap, alternatives M-B1, M-B2, M-C1, and M-C2 include the installation of an SVE system which would be designed to prevent future releases of VOCs into the ground water. The SVE system would remove VOCs from the vadose zone and create a vapor barrier. The current interim action pump and treat cascade aerator provides additional protection by preventing the off-site migration of contaminated ground water.

Alternatives M-C1, M-C2, and M-D1 also provide for excavation, consolidation and disposal of waste materials into a single landfill constructed at the NPI Site. In addition to eliminating human health risks posed by direct contact, the landfill double liner and leachate collection system would minimize vertical migration of contaminants from the landfilled wastes to on-site ground water. Similarly, alternative M-D2, which disposes of all waste materials at an off-site landfill, would eliminate human health risks posed by direct contact. The excavation and off-site land disposal of these wastes would also eliminate contaminant migration from these wastes to the ground water. Alternatives M-E and M-F would treat the contaminated soils by removing and/or destroying organics. However, some organics and inorganics would remain in the treated materials and/or residual ash which would require disposal at an on-site or off-site landfill.

Ditch 3

All Ditch 3 alternatives, with the exception of the No-Action Alternative, achieve protection of human health and the environment by eliminating exposure to contaminated soil at the Site and preventing migration of contaminants into the ground water. Alternatives D-B and D-C1 provide for the excavation of waste materials in conjunction with capping or landfilling of wastes. Capping and landfilling would eliminate human health risks posed by direct contact with contaminated soils by eliminating the exposure pathway. Alternative D-B consolidates Ditch 3 wastes with those at Melby Road, thereby creating a single area at the NPI Site for management of waste materials remaining on site. Alternative D-B would only be implemented in conjunction with the multi-layer cap and SVE system described in alternative M-B1. As discussed previously, the objective of the multi-layer cap and SVE would be to eliminate exposure to contaminated soil at the Site and prevent migration of contaminants into the ground water.

Alternative D-C1 provides for excavation, consolidation and disposal of waste materials into a single landfill constructed at the NPI Site. In addition to eliminating human health risks posed by direct contact, the landfill double liner and leachate collection system would minimize vertical migration of contaminants from the landfilled wastes to on-site ground water. Similarly, alternative D-C2, which disposes of all waste materials at an off-site landfill, would eliminate human health risks posed by direct contact. The excavation and off-site land disposal of these wastes would also eliminate contaminant migration from these wastes to the ground water.

Alternatives D-D and D-E would treat the contaminated soils by removing and/or destroying organics. However, some organics and inorganics would remain in the treated materials and/or residual ash which would require disposal at an on-site or off-site landfill.

Dry Wells 2 and 5

The No-Action Alternative, Alternative W-A, does not provide adequate protection of public health and the

environment because exposure to contaminated soils would continue. Alternative W-B would achieve protection of human health and the environment by eliminating exposure to contaminated soil at the Site and preventing migration of contaminants into the ground water. The excavation and disposal of contaminated soils at an off-site landfill would eliminate the risk of exposure to contaminated soil and leaching of contaminants into the ground water. The dry well area soils will be disposed of at an off-site landfill due to the presence of PCBs.

Ground-Water Remedial Alternatives

Plume 1-2

As the result of the significant remedial work already performed at the Site and at the ECMWF, the risk to human health posed by the presence of VOCs in the ground water has already been significantly mitigated or eliminated. The ground water affected by Plume 1-2 is currently being treated by a two column air stripper at the ECMWF prior to its distribution to the City's residents. Water treated by the air stripper meets all federal regulatory requirements and Wisconsin Ess. Furthermore, an on-site ground-water treatment system installed in 1994 currently prevents the off-site migration of contaminants in Plume 1-2. U.S. EPA is unaware of any ecological harm created by the VOCs present in Plume 1-2. Therefore, all Plume 1-2 alternatives achieve protection of human health and the environment since exposure to contaminated ground water has already been eliminated. Institutional controls are in effect to prevent area residences and businesses from using wells in the area for drinking water. All of the alternatives provide for long-term ground-water monitoring to track the effectiveness of this remedy.

The difference between the alternatives is the estimated time required to reach cleanup goals. It has been estimated that it will take approximately 160 years for the existing ECMWF air stripper and the on-site interim pump and treat system to restore the off-site portion of the aquifer to meet PALs. Alternatives GW1-B and GW1-C which involve the installation of one to two additional ground-water treatment systems (either cascade aerators or air strippers) within the plume would restore the off-site portion of the aquifer to meet PALs in approximately 60 to 80 years.

Plumes 3 and 4

Since a significant amount of remedial work has been performed at the Site, risk to human health has already been significantly mitigated or eliminated. The Hallie Sanitary District currently provides a permanent alternate drinking water supply to the areas affected by Plumes 3 and 4. In addition, 42 private wells in the affected areas were abandoned after residences and businesses were connected to the City of Eau Claire water supply. Institutional controls are in effect to prevent area residences and businesses from using wells in the area for drinking water. In addition, there is currently an on-site ground water treatment system designed to prevent the off-site movement of contaminants in Plume 3. Therefore, all alternatives for Plumes 3 and 4 achieve protection of human health and the environment since exposure to contaminated ground water has been eliminated. All of the alternatives provide for long-term ground-water monitoring to track the effectiveness of this remedy.

The difference between the alternatives is the estimated time required to reach cleanup goals. It has been estimated that it will take approximately 120 years for the existing on-site interim pump and treat system to restore the off-site portion of the aquifer to meet PALs. Alternatives GW3-B and GW3-C, which involve the installation of one to two additional ground-water treatment systems (either cascade aerators or air strippers) within the plume, would restore the off-site portion of the aquifer to meet PALs in approximately 35 to 40 years.

Plume 5

Since a significant amount of remedial work has been performed at the Site, risk to human health has already been significantly mitigated or eliminated. The Hallie Sanitary District currently provides a permanent alternate drinking water supply to the areas affected by Plume 5. Institutional controls are in effect to prevent area residences and businesses from using wells in the area for drinking water. Therefore, all alternatives for Plume 5 achieve protection of human health and the environment by eliminating exposure to

contaminated ground water. All of the alternatives provide for long-term ground-water monitoring to track the effectiveness of this remedy.

The difference between the alternatives is the estimated time required to reach cleanup goals. It has been estimated that the no-further-action alternative would restore the off-site portion of the aquifer to meet PALs in approximately 110 years. Alternatives GW5-B and GW5-C, which involve the installation of a ground-water treatment system (either a cascade aerator or an air stripper) within the plume, would restore the off-site portion of the aquifer to meet PALs in approximately 60 years.

COMPLIANCE WITH APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS addresses whether a remedy will meet federal and state environmental statutes and regulations and/or provides grounds for invoking a waiver.

Federal and state ARARs are summarized in Tables 2 and 3. U.S. EPA has determined that the selected remedy will meet all ARARs.

B. PRIMARY BALANCING CRITERIA

LONG-TERM EFFECTIVENESS AND PERMANENCE refers to the ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup standards have been met.

Source Control Alternatives

Melby Road and East Disposal Site

The no-further-action alternative, M-A, does not provide long-term effectiveness. All of the remaining alternatives would provide good long-term effectiveness against direct contact with and inhalation of soils and waste materials. Alternatives M-B1, M-B2, M-C1, M-C2, M-D1 and M-D2 include either capping or an on-site or off-site landfilling component for the contaminated soils. In addition to a multi-layer cap, alternatives M-B1, M-B2, M-C1 and M-C2 include an SVE system which would be designed to prevent the leaching of VOCs into the ground water, thereby enhancing long-term effectiveness of the ground-water component of the remedy. Alternatives M-C1 and –C2 include the partial removal of source materials from Melby Road. Although some of the source materials would be removed under these alternatives, a cap and SVE system are still included because the remaining wastes could still pose potential ground-water contamination.

Alternatives M-D1 and M-D2 include the excavation of all contaminated soils from Melby Road and East Disposal Sites and disposal of these wastes in either an on-site or off-site landfill. In addition to eliminating human health risks posed by direct contact, the landfill double liner and leachate collection system would minimize vertical migration of contaminants from the landfilled wastes to on-site ground water.

Alternatives M-E and M-F would treat the contaminated soils by removing and/or destroying organics. However, some organics and inorganics would remain in the treated materials and/or residual ash which would require disposal at an on-site or off-site landfill.

All of these alternatives would provide long term effectiveness as long as the integrity of the cap, the landfill liner, leachate collection system and/or SVE system are maintained. Assuming good construction quality of the containment components, the likelihood of remedy failure over time is remote.

Ditch 3

The no-further-action alternative, D-A, would not provide long-term protection. All of the remaining alternatives would provide good long-term protection against direct contact with and inhalation of soils and waste materials. These remaining alternatives all provide for the excavation of the contaminated soils from Ditch 3. Alternative D-B provides for consolidation and capping with SVE at Melby Road while alternatives D-C1 and D-C2 provide for either on-site or off-site landfill of the contaminated soils. Alternatives D-D and D-E provide good long-term protection by treating the contaminated soils and landfilling the remaining wastes at an on-site or off-site landfill.

Dry Wells 2 and 5

The no-further-action alternative, W-A, would not provide long-term effectiveness. Only alternative W-B would provide good long-term protection against direct contact with and inhalation of soils and waste materials because the contaminated soils are excavated and taken to an off-site landfill.

Ground-Water Remedial Alternatives

Plume 1-2

All of the alternatives would provide for long-term effectiveness and permanence. The drinking water supply at the ECMWF is currently treated by a two-column air stripper before distribution. Air strippers are a reliable and proven method of treating ground water contaminated with VOCs. Monitoring safeguards ensure that the drinking-water quality continues to meet federal regulations, Wisconsin ESs and, to a great extent, Wisconsin PALs. Enforcement activities associated with the ECMWF have ensured continued effectiveness of the air strippers until U.S. EPA believes they are no longer necessary for the protection of human health and the environment.

All of the alternatives would be effective in the long term because pumping at the ECMWF controls further downgradient plume migration, while the interim pump and treat system at the southwestern portion of the NPI Site was designed to prevent the off-site VOC migration in ground water. The effectiveness of the remedy would be tracked by long-term ground-water monitoring. Pursuant to the NCP, 5-year reviews will be conducted to determine if: 1) the pump and treat systems are effectively reducing contaminant concentrations in the plume; 2) the effective limit of the remedy has been reached; and 3) further remedial actions are needed. The estimated operating life of the ECMWF air stripper, which went into service in 1987, is approximately 20-25 years. The expected remaining life of the ECMWF air stripper is less than the restoration time (60 to 160 years) estimated by the model used during the FS. The ECMWF air stripper would be upgraded or replaced, if necessary.

Plumes 3 and 4

All of the alternatives would provide for long-term effectiveness and permanence. The Hallie Sanitary District currently provides drinking water to the areas affected by Plumes 3 and 4. This central distribution system is a reliable and proven method of providing a permanent drinking water supply. Monitoring safeguards ensure that the drinking-water quality continues to meet federal and state standards.

The effectiveness of the remedy would be tracked by long-term ground-water and surface-water monitoring. Pursuant to the NCP, 5-year reviews would be conducted to determine if the pump and treat systems are effectively reducing contaminant concentrations in Plumes 3 and 4, if the effective limit of the remedy has been reached or if additional actions are needed.

Plume 5

All of the alternatives would provide for long-term effectiveness and permanence. The Hallie Sanitary District currently provides drinking water to the areas affected by Plume 5. This central distribution system is a reliable and proven method of providing a permanent drinking water supply. Monitoring safeguards ensure that the drinking-water quality continues to meet federal and state standards.

The effectiveness of the remedy would also be tracked by long-term ground-water and surface-water monitoring. Pursuant to the NCP, 5-year reviews would be conducted to determine if the remedy is effectively reducing contaminant concentrations in Plume 5, if the effective limit of the remedy has been reached, or if additional actions are needed.

REDUCTION OF CONTAMINANT TOXICITY, MOBILITY, OR VOLUME through treatment addresses the anticipated performance of the treatment technologies a remedy may employ.

Source Control Alternatives

Melby Road and East Disposal Site

The no-further-action alternative, M-A, would not reduce contaminant toxicity, mobility, or volume. Alternatives M-B1, M-B2, M-C1, M-C2, M-D1 and M-D2 are principally containment alternatives, and would reduce contaminant mobility by capping the materials and/or landfilling them either on site or off site. Alternatives M-B1, M-B2, M-C1 and M-C2 also include an SVE component in conjunction with the cap, which would contain and remove VOCs from capped soils to reduce contaminant volume. Alternative M-E uses the LTTD treatment process to volatilize VOCs from the contaminated soils. Alternative M-F uses incineration to destroy organics in the contaminated soils, thereby reducing the toxicity, mobility and volume of the wastes.

Ditch 3

The no-further-action alternative, D-A, would not reduce contaminant toxicity, mobility, or volume. Alternatives D-B, D-C1 and D-C2 reduce contaminant mobility by capping and/or landfilling the contaminated soils. Both Alternatives D-D and D-E reduce the toxicity, mobility and volume through treatment. Alternative D-D uses LTTD to volatilize VOCs from the soils while alternative D-E uses incineration to destroy organics, thereby reducing the toxicity, mobility and volume through treatment.

Dry Wells 2 and 5

The no-further-action alternative, W-A, would not reduce contaminant toxicity, mobility, or volume. Alternative W-B reduces contaminant mobility by excavating and landfilling the contaminated soils off site.

Ground-Water Remedial Alternatives

Plume 1-2

All alternatives, including no further action, provide treatment (cascade aeration or air stripping) to reduce VOC concentrations in extracted ground water. Cascade aeration would be expected to remove approximately 30-40% of VOCs (based on the performance of the interim action cascade system), and air stripping would be expected to remove 99% of VOCs. The cascade aeration and air stripping processes would transfer VOCs from ground water to the ambient air. The VOCs removed from the water would not be destroyed, but would pose a much lower risk in the ambient air where it is quickly dispersed and diluted.

Plumes 3 and 4

All alternatives, including no further action, include treatment (cascade aeration or air stripping) to reduce VOC concentrations in extracted ground water. Cascade aeration would be expected to remove approximately 30-40% of VOCs (based on the performance of the interim action cascade systems), and air stripping would be expected to remove 99% of VOCs.

Plume 5

Alternatives GW5-B and GW5-C include either cascade aeration or air stripping to reduce VOC concentration in extracted ground water. Cascade aeration would be expected to remove approximately 30-40% of the VOCs (based on the performance of the interim action cascade systems), and air stripping would be expected to remove 99% of the VOCs.

SHORT-TERM EFFECTIVENESS considers the length of time needed to implement an alternative and the risks the alternative poses to workers, residents and the environment during implementation.

Source Control Alternatives

Melby Road and East Disposal Site

Implementation of alternative M-A and M-B2 would produce minimal short-term impacts to the community, workers or the environment since the contaminated soils would be left in place and capped. Similarly, alternative

M-B1, which involves the consolidation of minimal amounts of contaminated soil at Melby Road, would also produce minimal short-term impacts. However, alternatives M-C1, M-C2, M-D1, M-D2, M-E and M-F involve significant excavation of waste materials. This excavation and handling could generate dust in residential and commercial areas which would require monitoring and control. Exposure risks to on-site workers during waste excavation, hauling, and construction would be controlled by a site-specific Health and Safety Plan ("HASP"). Alternatives M-C1 and M-C2, which involve the movement of less material than M-D1, M-D2, M-E and M-F, would also generate less dust.

Ditch 3

Alternative D-A would produce minimal short-term impacts to the community, workers or the environment because the contaminated soils would be left in place. Alternative D-B, D-C1, D-C2, D-D, and D-E involve excavation of waste materials. This excavation and subsequent handling could generate dust in residential and commercial areas which would require monitoring and control. Exposure risks to on-site workers during waste excavation, hauling, and landfill construction would be controlled by a site-specific HASP. Alternatives D-B and D-C2 would be of shorter duration because the materials would either be consolidated with wastes at Melby Road or disposed of at an off-site landfill.

Dry Wells 2 and 5

Alternative W-A would produce minimal short-term impacts to the community, workers or the environment because the contaminated soils would be left in place. Alternative W-B would involve the excavation and off-site landfill of the contaminated soils and sediments. This excavation and subsequent handling could generate dust in residential and commercial areas which would require monitoring and control. Exposure risks to on-site workers during waste excavation and hauling would be controlled by a site-specific HASP.

Ground-Water Remedial Alternatives

Plume 1-2

All ground-water alternatives, including no further action, would achieve short-term effectiveness. A site specific HASP would be implemented to protect the public and on-site workers who would construct the remedy and who could be exposed to VOC-contaminated ground water. There are no significant public health or environmental impacts anticipated in constructing or implementing the remedial alternatives.

Plumes 3 and 4

All ground-water alternatives, including no further action, would achieve short-term effectiveness. A site specific HASP would be implemented to protect the public and on-site workers who would construct the remedy and who could be exposed to VOC-contaminated ground water. There are no significant public health or environmental impacts anticipated in constructing or implementing the remedial alternatives.

Plume 5

All ground-water alternatives, including no further action, would achieve short-term effectiveness. A site specific HASP would be implemented to protect the public and on-site workers who would construct the remedy and who could be exposed to VOC-contaminated ground water. There are no significant public health or environmental impacts anticipated in constructing or implementing the remedial alternatives.

IMPLEMENTABILITY addresses the technical and administrative feasibility of a remedy, including the availability of materials and services needed to implement a particular option.

Source Control Alternatives

Melby Road and East Disposal Site

The no-action alternative could be implemented immediately. The multi-layer cap(s) specified in alternatives

M-B1, M-B2, M-C1 and M-C2 could be readily constructed by local contractors. Multi-layer capping is widely used to prevent human contact with contaminants and to reduce leachate generation. Materials, equipment and labor are available to implement this alternative. An SVE system could also be designed and installed by local contractors.

Materials, equipment, labor and space are readily available to construct the on-site hazardous waste landfill specified in alternatives M-C1 and M-D1. Alternative M-D2 could also be implemented upon the selection of an appropriate off-site hazardous waste landfill. Since there are no operating hazardous waste landfills in Wisconsin, the excavated wastes would have to be transported to an out- of-state hazardous waste landfill. The selection of the landfill would be based on its environmental compliance status and its willingness to accept the wastes.

Alternative M-E and M-F are more difficult to implement than the other alternatives because they require pilot scale studies, specialized equipment and contractors experienced in these processes.

Ditch 3

The no-action alternative, D-A, could be implemented immediately. Compared to the remaining alternatives, alternative D-B would be the easiest to implement because it only involves the excavation and consolidation of waste materials at Melby Road where a multi-layer cap compliant with NR 660 would be installed. Alternatives D-C1 and D-C2 would require the construction of a new landfill or rely on off-site disposal. Alternatives D-D and D-F would be the most difficult to implement, relatively, because they would require pilot-scale studies.

Dry Wells 2 and 5

The no-action alternative, W-A, could be implemented immediately. Alternative W-B is implementable because the contaminated soils could be disposed of at a facility licensed to accept PCB-contaminated wastes, based on the concentrations of PCBs detected in these materials.

Ground-Water Remedial Alternatives

Plume 1-2

The no-further-action alternative can be implemented almost immediately. Existing monitoring wells could be utilized in the long-term ground-water monitoring program. Implementability concerns for alternatives GW1-B and GW1-C include obtaining property access and the design and construction of pump and treat systems which will meet surface water quality based WPDES requirements. It may be necessary to treat the metals in the extracted ground water, modify or relocate the outfall or obtain a variance to comply with the WPDES requirements. The use of municipal storm sewers and/or obtaining property rights and easements from local government and private landowners to construct on-site recharge basins or discharge pipelines could also pose implementation problems. Finally, although the impact of alternatives GW1-B and GW1-C on the ECMWF has not been modeled, the City of Eau Claire has expressed concern, based on the principles of hydraulics, that extraction wells located upgradient of the well field would reduce the volume and possibly affect the direction of ground-water flow to the well field, thereby decreasing the volume and/or quality of water currently available.

Plumes 3 and 4

The no-further-action alternative can be implemented almost immediately. Existing monitoring wells could be utilized in the long-term ground-water monitoring program. Implementability concerns for alternatives GW3-B and GW3-C include the design and construction of pump and treat systems which will meet surface water quality based WPDES requirements. It may be necessary to treat the metals in the extracted ground water, modify or relocate the outfall or obtain a variance to comply with the WPDES requirements. Additional implementability concerns include the use of Eau Claire storm sewers, construction on private and municipal property, and construction across local roads.

Plume 5

The no-further-action alternative can be implemented almost immediately. In conjunction with existing monitoring wells, additional ground-water monitoring wells may be installed for the long-term ground-water monitoring program. Implementability concerns for alternatives GW5-B and GW5-C include the design and construction of pump and treat systems which will meet surface water quality based WPDES requirements. It may be necessary to treat the metals in the extracted ground water, modify or relocate the outfall, or obtain a variance to comply with the WPDES requirements. Additional implementation concerns include the use of municipal storm sewers, construction on private and municipal property, and construction across local roads.

COST includes estimated initial capital, operation and maintenance ("O&M") costs, and net present worth costs.

The estimated costs for all of the FS alternatives are listed below. The first column lists the capital or construction costs for the project. The second column lists the costs to operate the remedial system once it is constructed. The final column represents the sum of the first two columns.

Source Control Alternatives

Melby Road & East Disposal Site

	Capital Cost	Annual O&M Costs	Total Cost
M-A	$0	$0	$0
M-B1	$2,890,000	$78,500	$ 3,900,000
M-B2	$3,040,000	$130,000	$4,700,000
M-C1	$5,150,000	$130,000	$7,040,000
M-C2	$8,300,000	$130,000	$9,950,000
M-D1	$7,600,000	$71,500	$8,500,000
M-D2	$21,500,000	$0	$21,500,000
M-E	$23,870,000 to $37,790,000	$71,500 to $0	$24,760,000 to $37,790,000
M-F	$54,470,000 to $64,090,000	$71,500 to $0	$54,360,000 $64,090,000

Ditch No. 3

	Capital Cost	Annual O&M Costs	Total Cost
D-A	$0	$0	$0
D-B	$220,000	$0	$220,000
D-C1	$827,000	$3,500	$871,000
D-C2	$1,153,000	$0	$1,200,000
D-D	$1,790,000	$3,500 to	$1,840,000 to
	$2,120,000	$0	$2,120,000
D-E	$3,040,000 to	$0 to	$3,040,000 to
	$3,590,000	$3,500	$3,590,000

Dry Wells 2 & 5

	Capital Cost	Annual O&M Costs	Total Cost
W-A	$0	$0	$0
W-B	$41,000	$0	$41,000

Ground-Water Remedial Alternatives

Plume 1-2

	Capital Cost	Annual O&M Costs	Total Cost
GW1-A	$0	$59,000	$730,000
GW1-B	$550,000 to $1,270,000	$129,000 to $499,000	$2,300,000 to $4,300,000
GW1-C	$737,000 to $1,800,000	$173,000 to $585,000	$2,900,000 to $5,900,000

Plumes 3 and 4

	Capital Cost	Annual O&M Costs	Total Cost
GW3-A	$0	$62,000	$764,000
GW3-B	$760,000 to $1,220,000	$188,000 to $653,000	$3,200,000 to $5,000,000
GW3-C	$999,000 to $1,680,000	$216,000 to $732,000	$3,900,000 to $6,400,000

Plume 5

	Capital Cost	Annual O&M Costs	Total Cost
GW5-A	$123,000	$62,000	$887,000
GW5-B	$819,000 to $848,000	$169,000 to $441,000	$3,200,000
GW5-C	$958,000	$193,000 to $470,000	$3,600,000 to $3,800,000

The estimated time frame for O & M costs is 30 years with a 7% discount factor. Additional present worth costs for time frames greater than 30 years are negligible. As with all costs estimated in an FS, a range of -30% to +50% is applicable to cover variations in actual cost.

C. MODIFYING CRITERIA

STATE ACCEPTANCE indicates whether, based on its review of the RI/FS and Proposed Plan, the State concurs with, opposes, or has no comment on the preferred alternative at the present time.

The State of Wisconsin has assisted in the development and review of materials in the Administrative Record. The State's position regarding the selected alternative is discussed in the statement issued by WDNR at the meeting on the Proposed Plan, September 29, 1995, and in a letter dated December 27, 1995. However, based on further discussions between the State and U.S. EPA, the State is expected to concur on the remedy selected in this ROD.

COMMUNITY ACCEPTANCE is based on comments received from the public during the public comment period. Comments have been submitted by the community and local government officials. The specific comments received are summarized in the attached Responsiveness Summary, along with U.S. EPA's responses to such comments.

IX. THE SELECTED REMEDY

Based on its complete evaluation of the alternatives, U.S. EPA believes that the selected remedy (Alternatives M-B1, D-B, W-B, GW1-A, GW3-A and GW5-A) will be protective of human health and the environment, comply with ARARs, be cost effective, and will utilize permanent solutions to the maximum extent practicable. U.S. EPA believes that the selected remedy satisfies all of the threshold criteria and represents the best balance of trade-offs among the remaining criteria of the NCP.

The components of the selected remedy are as follows:

Soil Vapor Extraction System

An SVE system will be installed and monitored at the Melby Road Disposal Site prior to installation of the multi-layer cap in order to identify the location of possible hotspots (areas of concentrated waste materials). If hotspots are identified, they will be excavated and disposed of in an off-site disposal facility. This hotspot removal approach will reduce the possibility that future waste removal would be required after the cap is installed. There is, however, no certainty that "hotspots" will be identified because either they do not exist or the SVE system will not detect their location. The SVE system will be designed to prevent future releases of VOCs into the ground water. A soil gas monitoring program will be implemented to monitor the effectiveness of the SVE system.

Consolidation of Wastes at Melby Road Disposal Site

Approximately 1,300 and 3,000 cy of soil mixed with waste forge compound will be excavated from the East Disposal Site and Drainage Ditch 3, respectively. These materials will be consolidated with waste at the Melby Road Disposal Site, thereby crating a single waste management unit at the NPI Site.

Multi-Layer Cap

A multi-layer cap compliant with Wisconsin Chapter NR 660 will be installed to cover all of the waste materials at the Melby Road Disposal Site. This cap will eliminate or significantly mitigate the potential for direct human contact with wastes and would reduce leachate generation at the NPI Site. The exact configuration of the Melby Road Disposal Site cap would be determined during Remedial Design. A typical cap consists of a synthetic, plastic membrane over a 2-foot-thick soil layer, a 1-foot-thick sand drainage layer, and an approximate 2-foot-thick topsoil layer. The topsoil layer will be seeded so that it would eventually be covered with grass. A ground-water monitoring program will be implemented upgradient and downgradient of the capped areas to monitor the effectiveness of the cap in reducing contaminant migration to ground water. The overall effectiveness of the cap will be tracked via a long-term ground-water monitoring system. U.S. EPA will seek deed restrictions limiting land use in the future development of the capped area.

Excavation and Off-Site Disposal

Approximately 50 cy of contaminated soils and sediments at Dry Wells 2 and 5 will be excavated, treated (if necessary), and disposed of in an off-site landfill. Due to the presence of PCBs and metals in these materials, they will be disposed of at a facility licensed to accept PCB-contaminated wastes.

Ground-Water Monitoring

Long term ground-water monitoring would be conducted to monitor and insure the effectiveness of the no-further-action with contingency alternative for Plume 1-2 and the no-further-action alternatives for Plumes 3, 4 and 5. Ground-water monitoring results will be evaluated annually to aid in predicting contaminant trends. A ground-water monitoring program to be developed during the design phase shall include but not be limited to: development of a continuous monitoring record; identification of select wells throughout the plume to monitor changes in both the horizontal and vertical extent of the plume; sampling frequency; and identification and monitoring of areas containing higher contaminant concentrations, if any.

U.S. EPA will evaluate the effectiveness of the selected remedy as part of the 5-year review process for sites where wastes are left on site. If the data available at the first such review is insufficient for a reliable trend analysis, evaluation of remedy performance will be completed in the subsequent review or at some earlier time to be established during the initial 5-year review. An evaluation of ground-water information gathered for each 5-year review will be used to determine whether or not there is a need for additional actions to reduce cleanup times. The 5-year reviews would also evaluate the technical impracticability of attaining PALs in the ground water. If U.S. EPA determines that it is technically impracticable to achieve PALs, a Technical Impracticability ARAR waiver under CERCLA may be granted for the Site. To the extent U.S. EPA's 5-year reviews indicate that it is not technically or economically feasible

to achieve PALs, NR 140.28 provides substantive standards for granting exemptions from the requirement to achieve PALs. Such exemption levels may not be higher than the Wisconsin ESs.

The ground-water cleanup goals (which must also be achieved within a reasonable period of time) for the contaminants of concern are the PALs. However, the determination of whether additional measures will be required for Plume 1-2 will be based on compliance/projected compliance with the ESs within a reasonable period of time. For this type of situation, a reasonable period of time for meeting the ESs (MCLs) can be defined as less than 30 years.

At each 5-year review or earlier, as necessary, U.S. EPA, in consultation with WDNR, will evaluate the following criteria in order to determine the need for additional remedial measures:

1. Comparison of existing contaminant levels throughout the plume to ESs (MCLs);

2. Trends in contaminant concentrations, if any;

3. Effectiveness of the interim pump and treat system/location, in conjunction with other source control measures, at cutting off the source of contamination at the NPI Site from the downgradient off-site Plume 1-2;

4. Ability to improve the current interim pump and treat system to provide greater effectiveness in cleaning up the downgradient plume;

5. Potential reduction in restoration timeframes to less than 30 years for ESs;

6. Potential for the contaminants in the ground water to reach asymptotic levels throughout the plume;

7. Negative impacts on the municipal water supply; and

8. Alternative remedial measures to meet ground-water standards and the cost thereof.

Additional measures will be necessary if an evaluation of the above criteria indicates: (1) concentrations within Plume 1-2 have not decreased; (2) concentrations within Plume 1-2 do not show the potential to decrease below ESs in less than 30 years; or (3) interim pump and treat systems, in conjunction with other source control measures, do not meet their remedial objectives of preventing off-site contaminant migration.

For Plumes 3, 4 and 5, the 5-year review will utilize ground-water monitoring data to evaluate the effectiveness of source cleanup actions and the need for additional actions.

Surface Water Monitoring

Long-term surface-water monitoring will be preformed for Plumes 3, 4 and 5 to monitor and ensure the effectiveness of the no-further-action alternative. Specifically, contaminant levels in Lake Hallie will be tracked through surface water monitoring to confirm that the Lake is not affected by ground-water discharge from Plumes 3, 4 and 5.

X. STATUTORY DETERMINATIONS

U.S. EPA's primary responsibility at Superfund sites is to select and implement remedial actions that achieve adequate protection of human health and the environment. Section 121 of CERCLA establishes several statutory requirements and preferences. When complete, a remedy selected by U.S. EPA must comply with ARARs under federal and state environmental laws (unless a statutory waiver is justified). The selected remedy must also be cost effective and utilize permanent solutions and alternative treatment or resource recovery to the maximum extent practicable. Finally, the statute includes a preference for remedies that employ treatment processes that permanently and significantly reduce the toxicity, mobility or volume of hazardous substances, pollutants and contaminants. The implementation of the selected remedy at the NPI Site satisfies

these requirements and preferences as follows:

A. Protection of Human Health and the Environment

The selected remedy will protect human health and the environment by eliminating exposure to contaminated soil at the Site and preventing the migration of contaminants into the ground water. On-site ground-water treatment systems currently prevent the off-site migration of contaminated ground water and reduce the volume of VOCs in on-site ground water. The installation of an SVE system at Melby Road will be designed to prevent future releases of VOCs into the ground water and reduce the volume of VOCs in on-site soils. The SVE system will remove VOCs from the vadose zone and create a vapor barrier. Capping the soils at Melby Road will eliminate human health risks posed by direct contact with contaminated soils by eliminating the exposure pathway. Waste materials from the East Disposal Site and Drainage Ditch 3 will be excavated and consolidated at the Melby Road Site where a multi-layer cap compliant with NR 660 will be installed. The consolidation of these waste materials will create a single area for management of waste materials at the NPI Site.

Institutional controls are now in effect to prevent area residences and businesses from using wells in the areas affected by Plumes 1-2, 3, 4 and 5 for drinking water. Residences in areas supplied with municipal water are allowed to use private wells for other purposes, such as irrigation and car washing, as long as there is no connection to indoor plumbing. To use these wells, property owners must submit annual permit requests to either the City of Eau Claire's Health Department or the Hallie Sanitary District.

The long-term ground-water and surface-water monitoring will be conducted to ensure the effectiveness of the no-further-action alternative for Plumes 1-2, 3, 4 and 5. A final ground-water and surface-water monitoring program will be developed during the design phase. The ECMWF air stripper will continue to operate until such treatment is no longer needed to achieve regulatory levels.

B. Attainment of ARARs

The selected remedy will meet all ARARs under federal, and more stringent state environmental laws. A list of ARARs for the Site is contained in Tables 2 and 3. The primary ARARs that will be achieved by the selected remedy are:

1. Chemical Specific

Chemical-specific ARARs include those laws and requirements that regulate the release of contaminants to the environment. These include:

Clean Air Act [42 U.S.C. § 7401 et seq]; Wisconsin Environmental Protection Law, Subchapter III-Air Pollution [Wis. Stat. 144.30-144.426]

40 CFR 50; Wis. Admin. Code NR 404, 445 - Air Pollution Control Regulations. These regulations establish standards for emission of pollutants into the ambient air. Since the selected remedy involves excavation, construction and SVE activities which may release contaminants or particulates into the air, emission requirements promulgated under this act are relevant and appropriate. The need for treatment of air emissions produced by these processes would be determined based on substantive requirements of Wis. Admin. Code NR 445. If emissions are expected to exceed those standards, the remedy will be designed to reduce such emissions to acceptable levels or provide for treatment to satisfy these Wisconsin standards.

Safe Drinking Water Act [40 U.S.C. § 300 et seq.]

40 CFR 141, Wis. Admin. Code NR 109 - MCLs. MCLs establish drinking-water standards for potential and actual drinking water sources. MCLs have been exceeded at the Site in the aquifer affected by Plume 1-2 which is presently being used as a drinking water source by the City of Eau Claire. A two-column air-stripper currently treats the water in Plume 1-2 before its distribution to the municipal water supply. Water treated by the air strippers meets all MCLs and non-zero Maximum Contaminant Level Goals ("MCLGs"). MCLs have also been exceeded in Plumes 3 and 4, which no longer serve as a drinking water supply. MCLs have been attained, but not exceeded, in Plume 5, which also no longer serves as a drinking water supply. The selected remedy

achieves compliance with MCLs and non-zero MCLGs.

Wis. Admin. Code NR 140 - Ground Water Quality Standards. These standards provide for ground-water quality standards including PALs, Wisconsin ESs, and Wisconsin Alternative Concentration Limits ("WACLs"). The selected remedy, building on the previous OUs, is intended to achieve compliance with PALs at all monitoring points. To the extent U.S. EPA's 5-year reviews indicate that it is not technically or economically feasible to achieve PALs, NR 140.28 provides substantive standards for granting exemptions from the requirement to achieve PALs. Such exemption levels may not be higher than the Wisconsin ESs. U.S. EPA also has a procedure for granting a technical impracticability waiver under CERCLA.

Wisconsin Environmental Protection Law, Subchapter II-Water and Sewage [Wis. Stat. § 144.02-27]

Wis. Admin. Code NR 102 and 105 - Surface water quality standards. NR 102 creates an antidegradation policy for all waters of the state and prohibits toxic substances in surface waters at concentrations which adversely affect public health or welfare, present or prospective water supply uses, or protection of animal life. Surface water samples collected from Lake Hallie during the RI showed that contaminant concentrations were well below Wisconsin surface water quality standards.

Toxic Substances Control Act [15 U.S.C. § 2601 et seq.]

40 CFR 761; Wis. Admin. Code NR 157 - Management of PCBs and Products Containing PCBs. These provisions are applicable to the storage, collection, transportation, processing and final disposal of PCBs and products containing PCBs.

2. Action Specific

Wis. Admin. Code NR 141 - Ground-Water Monitoring Well Requirements. These requirements establish minimum acceptable standards for the design, installation, construction, abandonment and documentation of ground-water monitoring wells, and are applicable to the existing monitoring wells and any to be installed as part of the long-term monitoring program.

Wis. Admin. Code NR 718 - Management of solid wastes excavated during response actions. These requirements are applicable for the storage, transportation, treatment and disposal of contaminated soil and certain other solid wastes excavated during response actions.

Wis. Admin. Code NR 720 - Soil Cleanup Standards. These soil standards were developed based on the ground-water standards (PALs) of Chapter NR 140 for the ground-water exposure pathway. These soil standards were designed to assure that ground-water standards will not be exceeded due to leaching of residual contamination from the soil to the ground water. These requirements apply to soils remaining at Ditch No. 3 and the East Disposal Site after excavation and consolidation at the Melby Road Disposal Site.

Resource Conservation and Recovery Act ("RCRA"), as amended [42 U.S.C. § 6901 et seq.]; Wisconsin Environmental Protection Law, Hazardous Waste Management Act [Wis. Stat. § 144.60-74]

Most federal RCRA requirements are administered under the State of Wisconsin's equivalent regulations. U.S. EPA has determined that the waste forge compound contains the spent solvent TCA which is a listed hazardous waste pursuant to NR 605.09 of the Wisconsin Administrative Code (Wisconsin's equivalent ot the federal table of hazardous wastes from non-specific sources, 40 C.F.R. § 261.31). Excess forge compound generated during NPI's production processes was mixed and co-disposed of with spent TCA, forming a combined waste stream which must be treated as a listed hazardous waste. RCRA hazardous waste treatment and disposal regulations are therefore applicable. The following requirements are also applicable or relevant and appropriate:

Wis. Admin. Code NR 605; 40 CFR 261 - Identification of Hazardous Wastes. Provides requirements for determining when a waste is hazardous. The substantive requirements of these regulations will apply to any on-site TCLP testing of treatment residuals and waste excavated at the Site which may be disposed of off-site.

Wis. Admin. Code NR 615; 40 CFR 262 - Standards Applicable to Generators of Hazardous Waste. These standards provide requirements for the shipment of wastes to treatment, storage or disposal facilities. These requirements apply to on-site preparations for off-site shipment of dry well soils and other wastes.

Wis. Admin. Code NR 620; Department of Transportation Hazardous Materials Transportation Act [49 U.S.C. § 1801]; 40 CFR 263 - These standards are applicable to transporters of hazardous waste. They require record keeping, reporting and manifesting of waste shipments. These requirements are relevant and appropriate to on-site preparations for off-site shipment of dry well soils and other wastes.

Wis. Admin. Code NR 630.10-17; 40 CFR 264, Subpart B - General Facility Requirements. These requirements establish substantive requirements for security, inspection, personnel training, and materials handling which are relevant and appropriate to on-site activities involving excavations and handling of hazardous soils and materials.

Wis. Admin. Code NR 630.21-22; 40 CFR 264, Subpart D - Contingency Plan and Emergency Procedures. These procedures establish substantive requirements for emergency planning which are relevant and appropriate for on-site activities involving excavation and handling of hazardous substances.

Wis. Admin. Code NR 675; 40 CFR 268 - Land disposal Restrictions ("LDRs"). These regulations govern the storage and land disposal of hazardous waste. Consolidation of waste materials will occur within the area of contamination at the NPI Site. Therefore, the requirements of these regulations will not be triggered for on-site soil consolidation. LDR requirements will be applicable, however, to any off-site treatment of the wastes excavated from Dry Wells 2 and 5 or hotspot wastes excavated from Melby Road that are RCRA hazardous waste.

3. Location-Specific

Location-specific ARARs are those requirements that relate to the geographical location of a site. No location-specific ARARs have been identified for this action.

4. To Be Considered

Federal and state policies and guidance to be considered are listed in Tables 4 and 5.

C. Cost Effectiveness

The selected remedy is the most cost-effective remedy that also achieves ARARs and satisfies the other criteria of the NCP and Section 121 of CERCLA.

D. Utilization of Permanent Solutions and Alternative Treatment Technologies to the Maximum Extent Practicable

U.S. EPA has determined that the selected remedy represents the maximum extent to which permanent solutions can be utilized in the most cost-effective manner to eliminate exposure to contaminated soil at the Site and prevent the continued migration of contaminants into the ground water. Of the alternatives that are protective of human health and the environment and comply with ARARs, U.S. EPA has determined that the selected alternative provides the best balance in terms of long-term effectiveness and permanence, reduction in toxicity, mobility or volume through treatment, short-term effectiveness, implementability, cost and consideration of state and community acceptance.

E. Preference for Treatment As A Principal Element

The SVE will provide both treatment and containment of VOCs in the soils to be consolidated at the Melby Road Disposal Site. An SVE system will be installed to remove VOCs from the soils and to provide a vapor barrier to prevent the migration of VOCs into the ground water. Based on the SVE pilot study, it is anticipated that a treatment system will not be required for SVE emissions. However, the emissions from the full scale SVE system will be tested and a treatment system installed if emission levels exceed state and federal standards.

The contaminated soils from Drainage Ditch No. 3 and the East Disposal Site will be consolidated at Melby Road where a multi-layer cap compliant with NR 660 will provide long-term protection against direct contact and inhalation of contaminated soils. The cap and SVE system at the Melby Road Site will significantly reduce the mobility of hazardous substances.

This final remedy at the NPI Site builds upon two previous OUs, the ECMWF remedy, and on-going removal work. The combined cleanup work at the NPI Site satisfies the statutory preference for treatment. A two-column air stripper was installed at the ECMWF to treat contaminated ground water in Plume 1-2, and two cascade aeration systems were installed on the NPI Site to prevent the off-site migration of contaminated ground water in Plumes 1-2 and 3. Removal work to date has included the excavation of sludges and contaminated soils from Lagoon No. 1, which was then used as supplemental fuel for cement kilns.

XI. RESPONSIVENESS SUMMARY

This Responsiveness Summary has been prepared to meet the requirements of Sections 113(k)(2)(B)(iv) and 117(b) of CERCLA, as amended by SARA, which requires U.S. EPA to respond "to each of the written or oral presentations" on a Proposed Plan for remedial action. On September 20, 1995, U.S. EPA made available to the public for review and comment the FS and Proposed Plan for the final remedy at the NPI Site. U.S. EPA received comments at the public meeting on September 27, 1995, at the Hallie Town Hall. Additional written comments were also submitted to U.S. EPA during the comment period. This Responsiveness Summary summarizes those comments and concerns expressed by the public and other interested parties in written and oral form on the recommended remedy.

Summary of Comments Received During the Public Comment Period

Comments received during the public comment period are summarized in this section. Some of the comments have been paraphrased in order to effectively summarize them in this document. For the sake of consistency and privacy, U.S. EPA has referred to all individual commenters as "he." The reader is referred to the public meeting transcript and copies of written comments submitted, all of which are contained in the Administrative Record for the NPI Site. The Administrative Record is available for review at the information repositories.

Comment: The City of Eau Claire expressed opposition to U.S. EPA's recommended cleanup remedy for the NPI Site because it believed that the plan does not guarantee the protection of human health. The City expressed concern that "the proposed plan alters the previous assumption that treatment of contaminated ground water at the Eau Claire municipal well field was short term. The physical facilities and contractual guarantees do not exist to assure long-term treatment of the water supply. We were unable to identify anything in the proposed plan that addressed this issue."

The comment further stated, "The plan relies totally on long-term treatment of the leading edge of Plumes 1-2 at the municipal well field to protect the health and environment. However, the plan does not address long-term treatment. The plan indicates that this alternative has no additional capital cost. In addition, the plan indicates that treatment will continue in accordance with a previous record of decision. Previous actions provide only interim treatment guarantees."

U.S. EPA Response: U.S. EPA believes that the selected remedy adequately assures the long-term protection of human health by providing for the continued operation and maintenance of the air stripper at the ECMWF. The proposed plan states that the recommended "alternative includes any measures required to insure the continued effectiveness of the ECMWF air stripper and their long-term operation and maintenance." Moreover, the 1993 ECMWF Cost Recovery Consent Decree executed by U.S. EPA and NPI specifically states that NPI "shall be liable for all Operation and Maintenance costs until such time that U.S. EPA determines, consistent with the final Record of Decision for the National Presto Industries, Inc. Superfund site, that the obligation shall cease." The final ROD for the NPI Site does provide for the long-term operation and maintenance of the ECMWF air stripper as well as any future measures required to ensure its continued effectiveness. U.S. EPA is aware that the anticipated remaining life of the ECMWF air stripper is less than the estimated restoration time of the plume, but has provided in this ROD for the upgrade or replacement of the ECMWF air stripper, if necessary.

U.S. EPA disagrees with the City's position that the selected remedy relies solely on treatment at the municipal well field to protect human health and the environment. In addition to the air stripper at the municipal well field, two pump and treat systems currently operate at the NPI Site to prevent the off-site migration of contaminated ground water in Plumes 1-2 and 3. In addition, the proposed plan includes long term ground-water monitoring to insure the effectiveness of the alternative. Although additional capital costs for the air stripper were not included in the proposed plan, the ECMWF Consent Decree provides the mechanism by which such costs could be provided. With respect to the ground-water treatment systems currently operating in accordance with previous RODs, the final ROD provides for the long-term operation of these systems.

Comment: One commenter wanted to be assured that "there is no ground-water contamination in an area outside the designated area." The commenter wanted further assurances that Lake Hallie is cleaned up, no waste is being discharged in the Lake, and that "the ground water quality is good." The commenter felt that it should be U.S. EPA's responsibility to extend water lines if the ground water travels beyond the affected area.

U.S. EPA Response: The final boundaries of the affected area were determined based on the results of extensive private and monitoring well sampling conducted from 1985 to 1989. The date generated during the NPI RI was integrated with the historical database to ensure that the affected area encompassed private wells contaminated or threatened by contamination from the NPI Site. The Hallie Sanitary District currently serves the areas impacted or threatened by contamination from Plumes 3, 4 and 5. Based on further sampling of private wells after the creation of the District, it is highly unlikely that the plumes will travel beyond the presently defined affected areas. Moreover, the 1991 ROD provided for on-site pump and treat systems to prevent the off-site migration of contaminated ground water from the NPI Site.

All of the surface-water samples collected during the RI show VOC levels in Lake Hallie remain well below U.S. EPA's ambient water quality criteria and Wisconsin's surface water quality standards. Since the area is currently served by the Hallie Sanitary District, the ground water poses no risk to human health.

Comment: One resident stated that he was happy to be receiving water from the Hallie Sanitary District and that he would like to see the District expanded. Furthermore, he hoped that U.S. EPA's selections will be the best and work will begin soon.

U.S. EPA Response: U.S. EPA is pleased to hear that residents are happy with the water from the Hallie Sanitary District. The District was originally formed to provide drinking water to all areas affected by Plumes 3, 4 and 5. Additional expansion of the District would be based on the local residents' desire for expansion.

Comment: One commenter expressed concern about the contamination that still exists in the NPI lagoons and that contaminants could continue leaching into the ground water. The commenter was concerned that the rapid growth in the nearby communities would require additional clean water in the near future.

U.S. EPA Response: NPI is currently in the process of cleaning up Lagoon No. 1 in accordance with the 1993 Administrative Order on Consent. Following the excavation of all liquids and solid wastes, an investigation of the underlying soils will be performed to determine whether these soils contain residual contamination. If U.S. EPA determines that contaminants in the remaining soils are still migrating into the ground water at levels above Wisconsin PALs, WDNR has indicated that it believes further remediation of these soils may be required. It is important to note that the pump and treat cascade aeration system at the NPI Site currently prevents contaminated ground water from migrating off-site. U.S. EPA fully expects that the Hallie Sanitary District will be able to supply water for the expanding local communities.

Comment: Although one commenter was in favor of continued cleanup measures, he expressed concern that the ground-water cleanup timeframes are too long.

U.S. EPA Response: It is important to understand the ground-water cleanup timeframes given in the proposed plan are merely estimated timeframes based on ground-water models. In determining the estimated time frames, conservative numbers were input into the models. Actual clean up times may vary based on existing field conditions. All of the ground-water cleanup alternatives involve lengthy cleanup timeframes. U.S. EPA

regulations require that, in choosing among the alternatives, it must balance a variety of factors which include, among others, implementability and cost effectiveness. U.S. EPA determined that, despite the ground-water cleanup time frame, the selected remedy represented the best balance of the criteria that must be taken into account.

Comment: One commenter felt that if taxpayer money is used, all the costs and payments should be fully open to the public.

U.S. EPA Response: U.S. EPA periodically generate an itemized cost summary of its expenditures at the NPI Site, which could be made available upon request.

Comment: One commenter felt that a leachate collection system should be installed to collect contaminants that may leach from the waste mixture at the Melby Road Site. The commenter felt that contaminants above existing standards will continue to migrate off site in violation of state law without a leachate collection system. An alternative that does not eliminate or totally control the contaminants is unacceptable.

U.S. EPA Response: U.S. EPA believes that a leachate collection system would be unnecessarily duplicative of the on-site pump and treat systems. These systems were designed to prevent the off-site migration of contaminated ground water above state and federal standards. Moreover, the Melby Road cap will be constructed to minimize leachate generation, and the SVE system will be designed to prevent the migration of VOCs into the ground water. U.S. EPA has concluded, therefore, that the proposed remedy totally controls the off-site movement of the contaminants of concern at the NPI Site.

Comment: One commenter recommended a newly developed technology for rapid remediation of soils and ground water. This process is known as Geo-Cleanse and utilizes a method of injecting hydrogen peroxide to oxidize contaminants.

U.S. EPA Response: U.S. EPA has reviewed literature provided by S & S Industrial Services, Inc. on the Geo-Cleanse Process and evaluated its potential use in the remediation at the NPI Site. Based on the review of the case studies included with the literature, the Geo-Cleanse process would not be viable for the waste materials at the NPI Site because the chlorinated solvent are entrapped within the highly impermeable waste forge compound and areas containing chlorinated solvents have not been defined at the NPI Site. The literature states that hydraulic fracturing may be used to increase the permeability of the material to be treated; however, a process like hydraulic fracturing would not be a viable method of increasing the permeability of the waste forge compound.

Furthermore, the case studies presented with the study are for localized ground-water contamination contained within a few hundred square feet. The major plumes originating from the NPI Site are 16,000 feet and 7,000 feet long, respectively. If these plumes were to be treated using the Geo-Cleanse process, several hundred injector wells would be required within the plume area. In addition, obtaining access for placement of injector wells may be difficult because the ground-water plumes at NPI run under several heavily developed areas. In addition to the installation of injector wells, several buildings may be required for chemical mixing, control panels and utilities. Finally, the process may also require the addition of an iron catalyst to generate a hydroxyl radical. The iron eventually precipitates out and the process may also precipitate other metal compounds, thereby adversely affecting the porosity of the aquifer. Even if the Geo-Cleanse process were viable for ground-water treatment at the NPI Site, it would be very difficult to implement and most likely cost prohibitive due to the lengths of the plumes.

U.S. EPA has additional concerns about the other ingredients (besides hydrogen peroxide and iron) which may be added to the injection solution. Even though the literature claims that the additives are environmentally safe, the type of additives was not disclosed in the literature and therefore, this statement cannot be verified. The literature states that excess additives will be utilized by the soil and ground-water micro-organisms as a nutrient source. The ground water at NPI does not require a nutrient source. Although excess hydrogen peroxide would decompose into oxygen and water, any other additive could result in ground-water contamination. Since the Geo-Cleanse process does not address removal of excess additives, the additives would need to be carefully studied to determine its effect on ground-water quality and the aquifer.

Comment: One commenter requested an evaluation of a filtration system on the SVE stack for capturing VOC emissions or at least requiring testing of the stack gases to make sure that the emissions do not exceed allowable levels under state and federal standards.

U.S. EPA Response: Based on the SVE pilot study performed at the Site, it is not anticipated that a treatment (filtration) system will be required for the SVE emissions. However, the emissions from the full scale SVE system will be tested and a treatment system installed if emission levels exceed state and federal standards.

Comment: The WDNR "accepts at this time the selection of alternatives as recommended by U.S. EPA for each source area of concern as identified in National Presto's Remedial Investigation and Feasibility Study. The Department of Natural Resources does not agree it is in the best interest of the state's natural resources that the lengthy groundwater restoration periods be accepted..... Additionally, the creation of a permanent disposal site at Melby Road while satisfying the Department's On-Site and In-State policies does not achieve restoration of the environment.... The Department accepts U.S. EPA's proposed plan that all areas of concern will be re-evaluated at the five-year review and subsequent implementation of additional remedies will be undertaken if conditions so warrant. DNR believes at the five-year review all parties, U.S. EPA, DNR and National Presto, should evaluate whether it would be cost-effective to implement additional treatment remedies in the groundwater plumes in lieu of continuing the O&M costs. The viability of mechanical systems cannot be assumed and additional safeguards to protect public health and the environment must be sought, if necessary to relieve the lengthy burden proposed by U.S. EPA. Financial assurances that subsequent restoration action can be taken must be a component of the final remedy of the site."

U.S. EPA Response: WDNR's comment is further clarified in the December 27, 1995 letter from Jane Lemcke, Superfund Remedial Unit Leader at WDNR, to Wendy Carney, Superfund Remedial Branch Chief at U.S. EPA. This letter stated that the WDNR did not concur with U.S. EPA's proposed remedy for the NPI Site. Subsequent discussions between U.S. EPA and WDNR have resulted in Wisconsin's concurrence with the final remedy for the NPI Site. U.S. EPA believes that the proposed remedy satisfies the threshold criteria of protecting human health and the environment and compliance with ARARs. Furthermore, the proposed remedy represents the best balance with respect to the five "balancing" criteria and two "modifying" criteria. Financial assurances can be sought during negotiations for the Remedial Design and Remedial Action, but play no role in U.S. EPA's selection of a remedy.

Comments from the Revised Community Relation Plan

Comment: One resident said the current ground-water treatment is a waste of money because the technology is not addressing the source of the contamination. The resident said remedial activities should have started with the removal of the contaminated soils and sludges.

U.S. EPA Response: As stated above, the current ground-water treatment systems at the NPI Site are designed to prevent the off-site migration of contaminated ground water. The air stripper at the ECMWF currently treats all municipal ground water before its distribution of provide clean drinking water to the residents of Eau Claire. Recent activities at the NPI Site include the removal of contaminated soils and sludges from Lagoon No. 1. U.S. EPA traditionally addresses the most significant threats first at a Superfund site. At NPI, the threat to human health from drinking ground water was determined to be the most significant. U.S. EPA addressed this threat first by (1) providing for a bottled water program to affected households; and (2) requiring affected and potentially affected households to be connected to either the Eau Claire water system (for which U.S. EPA had earlier constructed an air stripper), or to a new Hallie Sanitary District. U. S. EPA then required the construction of the on-site pump and treat systems designed to prevent the off-site migration of contaminated ground water. Once the drinking water threat was addressed, U.S. EPA turned its attention to the direct contact or inhalation risks posed by on-site materials. Lagoon No. 1 remediation is nearing completion and, with the final remedy, all other known source areas will be addressed.

Comment: Residents were concerned that remedial activities would conflict with a Wisconsin Department of Transportation (WDOT) project of constructing a bypass for Highway 53 in the area of the Melby Road.

U.S. EPA Response: U.S. EPA does not anticipate that the remedial activities will conflict with the WDOT

project.

Comment: Residents said that they receive information only from U.S. EPA and would like to receive information from NPI. The community is cautious towards NPI and residents do not know whom to trust. Residents noted that NPI is not providing access to the areas currently under remediation, not providing site tours and not addressing community relations issues. Because NPI is not communicating with the public, residents think the company is hiding something.

U.S. EPA Response: The Superfund law does not require NPI to provide site tours and to be more "community friendly." NPI may not be providing the public access to areas under remediation because Superfund regulations require specific health and safety requirements for persons entering the exclusion zones of a Superfund site.

Comment: One resident said that NPI profits are up and the company has requested $15 million from the Army to continue cleanup operations. Some residents remarked that NPI should be paying for some of the cleanup. They are concerned that NPI is getting a free ride throughout the cleanup program for contamination the company created. Residents are disappointed that the Army is readily paying for the cleanup with the taxpayers' money.

U.S. EPA Response: U.S. EPA understands the resident's concerns with respect to the Army paying for cleanup. The Army, however, is a potentially responsible party for the NPI Site due to its involvement at the NPI Site during the years wasted forge compound was generated. To date, the cleanup work has been performed under various agreements between U.S. EPA and NPI. U.S. EPA has no involvement whatsoever with the agreements through which NPI receives reimbursement funds for cleanup work from the Army. Finally, NPI has represented to U.S. EPA that it has spent significant sums of its own funds for cleanup.

Comment: Several residents were concerned that Congress would not reauthorize Superfund and that would stop or slow NPI remedial activities. Residents were also concerned that U.S. EPA work at the Site could be interrupted during the Reauthorization process.

U.S. EPA Response: U.S. EPA agrees that all of these concerns are valid.

XII. ADMINISTRATIVE RECORD

01/19/90

ADMINISTRATIVE RECORD INDEX
NATIONAL PRESTO SITE
EAU CLAIRE,WISCONSIN

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	85/05/24	Letter re: Freedom of Information Act Request	Nauman, NPI, Inc.	USEPA - Region V	Correspondence	1
	5	85/06/24	Information Request Letter re: The USEPA has documented the releases or threatened releases of hazardous substances, pollutants and contaminants at NPI, Inc.	Constantelos, USEPA	Nauman, NPI, Inc.	Correspondence	2
	7	85/09/06	Letter re: Response to 6/14/85 Information request letter with attachment A-D	Nauman, NPI, Inc.	Oaks, USEPA	Correspondence	3
	3	85/12/02	Notice Letter re: The USEPA has documented the release or threatened release of hazardous substances, pollutants and contami-nants at NPI	Constantelos, USEPA	Nauman, NPI, Inc.	Correspondence	4
	1	85/12/11	Letter re: Negotiations begin for a RI/FS at NPI and requesting assistance from WDNR	Mains, USEPA	Giesfeldt, WDNR	Correspondence	5

1	85/12/13	Letter re: Confirming the extension for a response from NPI concerning responsible parties	Bartl, NPI, Inc.	Naff, USEPA	Correspondence	6
2	85/12/19	Letter re: Matters regarding prior owners should be forwarded to James P. Bartl and in his absence Richard A. Nauman	Bartl, NPI, Inc.	Naff, USEPA	Correspondence	7
2	86/01/08	Letter re: Notification of a proposed Superfund project to be by the USEPA	Constantelos, USEPA	Hanson, WI Dept. of Admin	Correspondence	8
5	86/04/24	Letter re: Information request by the USEPA pursuant to its authority under section 104 of CERCLA	Constantelos, USEPA	Agent for Uniroyal, Inc.	Correspondence	9
5	86/04/24	Letter re: Information request by the USEPA pursuant to its authority under Section 104 of CERCLA	Constantelos, USEPA	Agent, Western Elect. Co.	Correspondence	10
1	86/05/05	Letter re: The signing of an Administrative Order for the NPI site	Bartl, NPI, Inc.	Taliaferro, USEPA	Correspondence	11
1	86/05/14	Letter re: Confirming the phone conversation that NPI has reached agreement with the USEPA on the language to be included in the Administrative Order	Bartl, NPI, Inc.	Taliaferro, USEPA	Correspondence	12

2	86/05/22	Letter re: Information Request response	Shumway, Uniroyal, Inc.	Oaks, USEPA	Correspondence	13
5	86/05/23	Letter re: Information Request response	Allenby, AT&T Attorney	Oaks, USEPA	Correspondence	14
7	86/06/17	Letter re: Information request concerning alleged activities of AT&T Technologies, Inc., formerly Western Electric Company	Allenby, AT&T Attorney	Oaks, USEPA	Correspondence	15
1	86/07/08	Letter re: RI/FS Administrative Order - NPI Site	Nauman, National Presto Industries, Inc.	USEPA	Correspondence	16
1	86/07/23	Letter re: An Administrative order was issued by the USEPA Region V for the NPI Site	Adamkus, USEPA	Berney, NPI, Inc.	Correspondence	17
1	86/07/24	Letter re: A formal request for the review and evaluation of Pace Laboratories, Inc.'s qualifications and performance as required by the USEPA prior to performing analyses of waste, soil and water samples	Warren, Eder Associates	Mains, USEPA	Correspondence	18
2	86/08/12	Letter re: Summary of the approach to NPI RI/FS analytical work	Mains, USEPA	Warren, Eder Associates	Correspondence	19

2	86/09/08	Letter re: NPI RI/FS Work Plan	O'Hara, WDNR	Mains, USEPA	Correspondence	20
1	86/09/23	Letter re: Receipt of the following reports: 1. Appendix B/Health and Safety Plan 2. QAPP for RI/FS Sections IX-IVI 3. Qualifications Statement	O'Hara, WDNR	Warren, Eder Associates	Correspondence	21
3	86/09/30	Letter re: USEPA provided 16 Performance Evaluation (PE) samples to Pace Labs for the analysis of organic compounds and metals from the Hazardous Substance List (ESL) in accordance with Contract Laboratory Program (CLP) protocols, with letter dated 11/5/86 attached	Adams, Jr., USEPA	Vanderboon, Pace Labs, Inc.	Correspondence	22
3	86/10/06	Letter re: WDNR comments as QAPP for RI/FS	O'Hara, WDNR	Mains, USEPA	Correspondence	23
5	86/10/22	Letter re: Serves as comments on the draft Work Plan for the RI/FS at the NPI site	Mains, USEPA	Nauman, NPI, Inc.	Correspondence	24
1	86/11/05	Letter re: Region V Quality Assurance Office shipped PE samples for the NPI project to Pace Laboratories on 9/30/86	Mains, USEPA	Nauman, NPI, Inc.	Correspondence	25

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	1	86/11/13	Letter re: Confirming the one-week extension granted by EPA to Pace Laboratories for the submittal of the PE sample results	Nauman, National Presto Industries, Inc.	Mains, USEPA	Correspondence	26
	2	86/11/14	Letter re: Request for resubmitting the QAPP and installation of the monitoring wells	Nauman, National Presto Industries, Inc.	Mains, USEPA	Correspondence	27
	1	86/12/05	Letter re: Revised Work Plan has been completed and the request for the two week extension for QAPP has been granted	Warren, Eder Associates Consulting Engineers, P.C.	Mains, USEPA	Correspondence	28
	1	87/01/09	Letter re: Receipt of the 3 copies of the revised Work Plan for conducting a RI/FS, plus the first eight chapters of the QAPP	O'Hara, WDNR	Warren, Eder Associates	Correspondence	29
	2	87/01/14	Letter re: The review of the revised Work Plan has be completed	O'Hara, WDNR	Gifford, USEPA	Correspondence	30
	2	87/01/16	Letter re: Copy of the revised Work Plan Schedule for the RI/FS at NPI with schedule attached	Warren, Eder Associates	Gifford, USEPA	Correspondence	31
	1	87/01/28	Letter re: Additions to QAPP for NPI RI/FS	O'Hara, WDNR	Warren, Eder Associates	Correspondence	32

2	87/02/13	Letter re: The QAPP submitted to EPA on 1/16/87 by Eder Assoc. Inc. on behalf of NPI is not a complete submittal	Gifford, USEPA	Nauman, NPI, Inc.	Correspondence	33
2	87/02/24	Letter re: The USEPA entered into an Administrative Order by Consent with the Respondent, NPI	Constantelos, USEPA	Nauman, NPI, Inc.	Correspondence	34
2	87/03/05	Letter re: NPI Revised QAPP for RI/FS	O'Hara, WDNR	Gifford, USEPA	Correspondence	35
1	87/04/14	Letter re: Comments on Alternative Work Plan language proposed by Eder Associates	Kugle, WDNR	Gifford, USEPA	Correspondence	36
1	87/04/21	Letter re: The PE samples analyzed by Pace Laboratories, Inc.	Warren, Eder Associates	Gifford, USEPA	Correspondence	37
2	87/05/08	Letter re: Confirming the time frame for final approval of the Work Plan for the RI/FS at NPI	Nauman, NPI, Inc.	Gifford, USEPA	Correspondence	38
1	87/07/01	Letter re: Acknowledge-ment of receipt of revised RI/FS documents from Eder Associates	O'Hara, WDNR	Warren, Eder Associates	Correspondence	39
1	87/07/08	Letter re: Verifying that Wilson Laboratories is a CLP laboratory	Ascher, Wilson Labs	Warren, Eder Associates	Correspondence	40

2	87/07/09	Letter re: Formally requests a change in the laboratory performing sample analysis for the RI at NPI	Warren, Eder Associates	Gifford, USEPA	Correspondence	41
2	87/08/20	Letter re: Resolution of Dispute In regards to NPI	Alonzo and Gifford, USEPA	Peshek & Ragatz, NPI Attys	Correspondence	42
2	87/08/24	Letter forwarding the Statement of Work for Conducting a RI/FS, NPI, including the revised QAPP	Warren, Eder Associates	Gifford, USEPA	Correspondence	43
1	87/08/26	Letter re: WDNR finds revised Work Plan acceptable for conducting a technically adequate RI/FS	Giesfeldt, WDNR	Gifford, USEPA	Correspondence	44
1	87/09/01	Letter re: Selections of a laboratory	Gifford, USEPA	Warren, Eder Associates	Correspondence	45
1	87/09/16	Letter re: Receipt of Work Plan for Conducting a RI/FS and Revised QAPP for the NPI Surface Impoundment	Giesfeldt, WDNR	Warren, Eder Associates	Correspondence	46
2	87/10/13	Letter re: Necessary changes in the Health and Safety Plan for the RI/FS at NPI	Gifford, USEPA	Nauman, NPI, Inc.	Correspondence	47
3	87/10/14	Letter re: Final comments on the QAPP for the RI/FS	Gifford, USEPA	Nauman, NPI, Inc.	Correspondence	48

3	87/11/18	Letter re: A revised schedule for the RI/FS at NPI	Warren, Eder Associates	Gifford, USEPA	Correspondence	49
2	87/11/20	Letter re: The potential impact of past disposal practices at NPI on the residential well contami-nation in the Town of Hallie	Gifford, USEPA	Hagman, WDNR	Correspondence	50
1	87/12/09	Letter re: Work Plan for Conducting a RI/FS at NPI	Giesfeldt, WDNR	Warren Eder Associates	Correspondence	51
1	88/02/04	Letter re: Congress has authorized the expenditure of $5 million from the ammunition fund of the Army and NPI is to be charges with restoration	Haaz, WDNR Atty	Peshek, DeWitt, et.al.	Correspondence	52
3	88/06/15	Letter forwarding a letter from Wadsworth/ Alert Laboratories describing their procedures and detection limits for low level analysis of groundwater samples	Warren, Eder Associates	Gifford, USEPA	Correspondence	53

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	2	88/06/22	Letter re: Proposal to abandon 10 of 23 monitoring wells installed as part on North Eau Claire Environmental Repair fund study	Boettcher, WDNR	Gifford, USEPA	Correspondence	54
	1	88/10/14	Letter re: Standards which will apply to National Presto's cleanup of the groundwater contami-nation at its site in Eau Claire	Bocherz, WDNR	Birney, NPI, Inc.	Correspondence	55
	2	89/01/11	Letter forwarding table omitted from the QA/QC package on the results of soil and waste samples	Warren, Eder Associates	Gifford, USEPA	Correspondence	56
	2	89/02/10	Letter re: Concern over an agreement between the EPA, WDNR, and the City of Eau Claire dealing with groundwater contami-nation in the Township	Joles, Hallie Town Chairman	Congressman Obey	Correspondence	57
	1	89/03/06	Letter re: Confirms some of the issues discussed at the meeting held 2/9/89	Gifford, USEPA	Bartl, NPI, Inc.	Correspondence	58
	5	89/03/21	Letter re: Requesting the implementation of certain action with respect to the NPI Site	Bartl, NPI, Inc.	Gifford, USEPA	Correspondence	59

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	1	89/04/12	Letter re: Contaminated Water Problems in the Town of Hallie, Chippewa County, WI - Eau Claire Extension of Municipal Services	Steil, Sr., Brennan, et al	Gifford, USEPA	Correspondence	60
	1	89/04/12	Letter re: Confirming the position of the USEPA regarding an agreement for providing bottled water to certain residents in the Town of Hallie	Bartl, NPI, Inc.	Johnson, USEPA	Correspondence	61
	7	89/04/18	Letters forwarding the open letter from NPI, Inc. to concerned citizens	Bartl, NPI, Inc.	Heffland & Gifford	Correspondence	62
	1	89/04/21	Letter re: USEPA's intent to issue an Unilateral Order to NPI	Johnson, USEPA	Bartl, NPI, Inc.	Correspondence	63
	1	89/04/26	Letter re: Section 106 Unilateral Administrative Order	Bartl, NPI, Inc.	Johnson, USEPA	Correspondence	64
	4	89/05/02	Letter re: Investigation for a permanent water supply for the triangle area is progressing with exhibit 2 attached re: Information and Data Required for New Water Utility	Raihle, Hallie Town Atty	Bartl, NPI, Inc.	Correspondence	65

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	1	89/05/08	Letter re: Confirming that NPI commits to implementing a bottled water program and will perform a PFS as provided for in the 4/25/89 Unilateral Order	Bartl, NPI, Inc.	Gifford, USEPA	Correspondence	66
	2	89/05/11	Letter re: Comments on the Unilateral Order	Haaz, Atty for WDNR	Gifford, USEPA	Correspondence	67
	1	89/05/15	Letter re: Request for Funding	Town Board of the Town Hallie	USEPA	Correspondence	68
	1	89/05/16	Letter re: Formal request for an extension of the deadline for submittal of the PFS work plan required by the Unilateral Order for NPI	Nauman, NPI, Inc.	Gifford, USEPA	Correspondence	69
	1	89/05/22	Letter re: City of Eau Claire Well Field Buffer Zone	Neier, Town Board Chairman	Gifford, USEPA	Correspondence	70
	1	89/06/06	Letter re: Progressing with its plans for the creation of a water district	Raihle, Hallie Town Atty	Gifford, USEPA	Correspondence	71
	2	89/06/12	Letter re: Eau Claire Municipal Well Field Site Buffer Zone	Allans, USEPA	Neier, Chairman Town Board	Correspondence	72
	1	89/06/12	Letter re: Comments on Work Plan Addendum for RI/FS at NPI	Gifford, USEPA	Nauman, NPI, Inc.	Correspondence	73

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	9	89/06/13	Letter re: Reports on, and descriptions of, off-site downgradient potential sources of VOC contamination	Warren, Eder Associates	Gifford, USEPA	Correspondence	74
	1	89/06/20	Letter re: Comments on NPI Bottled Water Distribution Plan	Boettcher, WDNR	Gifford, USEPA	Correspondence	75
	1	89/06/22	Letter re: PRP's have been identified by the USEPA, but they aren't named as parties to the Unilateral Order	Bartl, NPI, Inc.	Johnson, USEPA	Correspondence	76
	2	89/06/23	Letter re: NPI Unilateral Order, Bottled Water Distribution Plan and PFS Work Plan	Gifford, USEPA	Nauman, NPI, Inc.	Correspondence	77
	3	89/06/27	Letter re: Request for Supplemental Information Pursuant to Section 104 (c) of CERCLA and Section 3007 of RCRA	Niedergang, USEPA	Naselwander, Pres. of Co.	Correspondence	78
	3	89/06/27	Letter re: Request for Supplemental Information Pursuant to Section 104 (c) of CERCLA and Section 3007 of RCRA	Niedergang, USEPA	Kupersmith, Rd, Trk, &T rail	Correspondence	79
	1	89/06/27	Letter re: Request for Supplemental Information Pursuant to Section 104 (c) of CERCLA and Section 3007 of RCRA	Niedergang, USEPA	Kneller, Gelce Truck Leas.	Correspondence	80

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	6	89/06/27	Letter re: Request for Supplemental Information Pursuant to Section 104 (c) of CERCLA and Section 3007 of RCRA with response attached	Niedergang, USEPA	Rabe, Cummins-Great Lakes	Correspondence	81
	3	89/06/27	Letter re: Request for Supplemental Information Pursuant to Section 104 (c) of CERCLA and Section 3007 of RCRA	Niedergang, USEPA	Schlosser, NW Equipmt., Inc.	Correspondence	82
	2	89/06/30	Letter of response to questions asked by USEPA regarding information request letter of 89/06/27	Haselwander, Haselwander Bros., Inc.	Gifford, USEPA	Correspondence	83
	1	89/07/06	Letter re: USEPA Emergency Removal Order	Johnson, USEPA	Bartl, NPI, Inc.	Correspondence	84
	2	89/07/07	Letter re: Response to questions asked in letter dated 6/27/89	Kupersmith III, Road, Track, & Trail	Gifford, USEPA	Correspondence	85
	3	89/07/07	Letter re: Agreements concerning off-site conditions at NPI made during telephone conversations	Warren, Eder Associates	Gifford, USEPA	Correspondence	86
	2	89/07/10	Corrected table to replace the one attached to the 7/7/89 letter	Warren, Eder Associates	Gifford, USEPA	Correspondence	87

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	5	89/07/11	Letter forwarding maps of areas considering annexation to Eau Claire	Spanel, City of Eau Claire	Gifford, USEPA	Correspondence	88
	1	89/07/12	Letter re: Response to letter dated 6/27/89 and a request for Supplemental Information Pursuant to Section 104 (E)	Sheng, Northwest Equip-ment, Inc.	Gifford, USEPA	Correspondence	89
	2	89/07/18	Letter forwarding a revised list of private wells to be sampled on the first quarterly sampling event	Warren, Eder Associates	Gifford, USEPA	Correspondence	90
	11	89/07/20	Letter forwarding a copy of materials received from Mr. Anderson regarding USEPA's policy on groundwater remedi-ation	Congressman Obey	USEPA	Correspondence	91
	6	89/08/15	Letter re: Receipt of memo dated 6/15/89, transmitting Resolution No. 38-89 passed by the Chippewa County Board of Supervisors and Local Emergency Planning Committee with memo attached	Adamkus, USEPA	Krell, Chippewa Courthouse	Correspondence	92
	1	89/08/21	Letter re: Request that no further annexation within the boundary of the proposed Sanitary District #1 be accepted	Anderson, City Manager, Eau Claire	Neier, Hallie Town Chairman	Correspondence	93

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	3	89/09/01	Letter re: Comments on the proposed sanitary district action	Bartl, NPI, Inc.	Sippel, Hallie Town Clerk	Correspondence	94
	1	89/09/06	Letter re: Request for a copy of the report prepared by NPI relative to the VOC contamination in the Town of Hallie	Raihle, Hallie Town Atty	Gifford, USEPA	Correspondence	95
	7	89/09/06	Letter re: Comments on the Eder Assoc. report entitled "Town of Hallie, WI, PFS Evaluating Alternative Permanent Water Supply Systems" August 1989	Boettcher, WDNR	Gifford, USEPA	Correspondence	96
	6	89/09/07	Letter re: Hallie Town Board is conducting a public hearing on Mon. evening, 9/11/89 concerning the creation of a town sanitary district	Anderson,, Eau Claire	Neier, Town Chairman City Manager	Correspondence	97
	4	89/10/05	Letter re: Sanitary District #1, Town of Hallie with Newsletter #2 attached	Raihle, Hallie Town Atty	Gifford, USEPA	Correspondence	98
	3	89/10/11	Letter re: The procedures for the collection and analysis of additional off-site samples for the completion of the RI	Warren, Eder Associates	Gifford, USEPA	Correspondence	99

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	2	89/10/13	Letter re: Selection and implementation of a remedy for the affected area defined in the Unilateral Order issued to NPI on 4/25/89	Adamkus, USEPA	Anderson & Neier	Correspondence	100
	5	89/10/13	Letter re: PFS Evaluating Alternative Permanent Water Supply Systems for the Town of Hallie, WI	Gifford, USEPA	Nauman, NPI, Inc.	Correspondence	101
	3	89/10/23	Letter re: PFS Evaluating Alternative Permanent Water Supply Systems for the Town of Hallie, WI	Gifford, USEPA	Nauman, NPI, Inc.	Correspondence	102
	1	89/10/24	Letter re: a follow up to previous conversation concerning the possibil-ity of making USEPA funds available for remedial design	Gifford, USEPA	Raihle, Hallie Town	Correspondence	103
	4	89/11/01	Letter re: Request for Supplemental Information Pursuant to Section 104 (E) of SURFLA and Section 3007 of RICRA for the NPI site	Althen, Penske Truck Leasing	Gifford, USEPA	Correspondence	104
	1	89/11/07	Letter re: Request for as extension beyond 11/8/89, to complete the revisions required by the USEPA and the WDNR for PFS	Warren, Eder Associates	Gifford, USEPA	Correspondence	105

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	89/11/13	Letter forwarding a corrected copy of Drawing No. 2 to be inserted into the November 19, 1989 draft of Phased Feasibility Study, Evaluation Alternative Permanent Water Supply Systems	Warren, Eder Associates	Gifford, USEPA	Correspondence	106
	4	89/11/17	Letter re: Discusses issues concerning the creation of Sanitary District #1 with letter dated 9/28/89 from Neier, the Town Chairman of Hallie to Senator Kohl attached	Adamkus, USEPA	Senator Kasten Jr.	Correspondence	107
	4	87/10/00	Fact Sheet re: Long Term Investigation Planned and Site Background for NPI, Inc.	USEPA		Fact Sheets	108
	2	89/03/00	Remedial Investigation Update	USEPA		Fact Sheets	109
	10	89/12/00	USEPA Issues Proposed Plan for Permanent Drinking Water Supply	USEPA		Fact Sheets	110
	4	88/03/30	3 Preliminary Drawings for the RI at NPI, with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Maps	111

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	4	88/05/18	Letter re: Location of Proposed Additional Monitoring Wells Map with letter regarding proposed additions to the RI at NPI attached	Warren, Eder Associates			
	1	89/01/00	Drawing entitled: Soil and Waste Analytical Results for RI/FS NPI, Inc. Site	Eder Associates		Maps	113
	2	89/02/01	Drawing entitled: "Water Table Contour Map, Sept. 1988" with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Maps	114
	17	89/10/02	The results of waste, soil and groundwater samples shown on drawings with cover letter and maps attached	Warren, Eder Associates	Gifford, USEPA	Maps	115
	2	89/10/25	Preliminary drawing which shows VOC concentrations is monitoring and private wells with letter attached	Warren, Eder Associates	Gifford, USEPA	Maps	116
	1	89/04/05	Agenda for NPI, Inc. Superfund Site's Public Meeting, held at Hallie Town Hall on 4/5/89 at 7:00pm	USEPA		Meeting Notes	117

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	3	86/04/14	Memo re: Complaint Investigation, National Presto Industries Property, Chippewa County	Boettcher, WDNR	File	Memorandum	118
	1	86/06/03	Memo re: Recommendation to Issue CERCLA 106 Consent Order to NPI, Inc. Eau Clair, WI	Schaefer & Constantelos	Adamkus, USEPA	Memorandum	119
	1	86/06/17	Memo re: Administrative Order for the National Presto RI/FS	O'Hara & Mains, USEPA	Taliaferro, USEPA	Memorandum	120
	1	86/07/18	Memo re: Notice of Selection of Pace Laboratory for National Presto RI/FS analytical Work	Niedergang, USEPA	Adams, Jr., USEPA	Memorandum	121
	2	86/07/21	Memo re: Letter attached advising the President of NPI that the Administrative Order by consent for an RI/FS signed by Adamkus on 6/4/86, became effective on 7/8/86	Constantelos, USEPA	Adamkus, USEPA	Memorandum	122
	1	86/07/25	Memo re: National Presto's request for a meeting on a schedule meaningful to work plan (including QAPP) develop-ment	Payne, USEPA	Mains, USEPA	Memorandum	123

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	1	86/08/11	Memo re: Q&O Review of Pace Laboratories for the NPI Site RI/FS	Mains, USEPA	Payne, USEPA	Memorandum	124
	2	86/09/26	Memo re: District comments on QAPP for RI/FS at NPI	Boettcher, WDNR	Kugle, WDNR	Memorandum	125
	8	86/12/19	Memo re: Systems Audit (Lab Evaluation) - Pace Laboratories, Minneapolis, WI - NPI	Adams, Jr., USEPA	Niedergang, USEPA	Memorandum	126
	6	87/02/24	Memo re: Review of QAPP for the RI/FS at the NPI Site	Adams, Jr., USEPA	Niedergang, USEPA	Memorandum	127
	2	87/10/30	Memo re: RI/FS Public Meeting	Kugle, WDNR	NPI Superfund File	Memorandum	128
	2	88/09/28	Memo re: Review of Standard Operating Procedure (SOP) for Analysis of Semi-Volatile Organics with Low Detection Limits, to be used for samples collected at the NPI Site	Adams, Jr., USEPA	Dikinis, USEPA	Memorandum	129
	1	89/01/25	Memo re: Priority Data Assessment Request	Niedergang, USEPA	Rose, USEPA	Memorandum	130
	1	89/01/27	Memo re: Data Assessment for NPI, Inc.	Churilla, USEPA	Gifford, USEPA	Memorandum	131
	1	89/01/30	Memo re: Health Assessment of Ground-water Data for NPI Site	Gifford, USEPA	Jordan-Izaguirre, USEPA	Memorandum	132

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	2	89/03/06	Memo re: Consultation on private well contamination north of NPI, Inc.	Bro, WDESS & Jordan-Izaguirre, USEPA	Gifford, USEPA	Memorandum	133
	5	89/04/19	Memo re: Meeting regarding NPI and Eau Claire Municipal Well Field (ECMWF) Superfund Sites in Eau Claire, WI	Allans & Gifford, USEPA	NPI and ECMWF Files	Memorandum	134
	3	89/10/10	Memo re: Draft PFS Report prepared by NPI, Eau Claire, WI	Ostredka, USEPA	Gifford, USEPA	Memorandum	135
	8	89/10/11	Memo re: Review of PFS Report prepared by NPI	Summerhays, USEPA	Gifford, USEPA	Memorandum	136
	3	89/10/13	Memo re: Water Division Review of the PFS prepared by NPI	Sutfin, USEPA	Constantelos, USEPA	Memorandum	137
	1	89/11/13	Memo re: Water Line Design for Eau Claire Municipal Wellfield, WI	Synder Jr., USEPA	Dikinsas, USEPA	Memorandum	138
	1	89/12/07	Memo re: National Presto, Proposed Plan	Kleiman, USEPA	Gifford, USEPA	Memorandum	139
	1	89/12/20	Memo re: Review of Draft Proposed Plan for NPI site	Boyer, USEPA	Gifford, USEPA	Memorandum	140
	2	90/01/05	Memo re: Water Div. Review of the Draft Proposed Pan for the NPI site	Sutfin, USEPA	Constantelos, USEPA	Memorandum	141

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	20	89/04/05	Comments from Hallie's residents re: the public meeting held on 4/5/89	Hallie Residents	USEPA	Other	142
	3	89/06/13	Certificate of Adoption of the Resolution Requesting Action re: VOC in Groundwater in the Town of Hallie	Dachel, Chippewa County Clerk		Other	143
	3	89/08/21	Notice of Public Hearing Proposed Sanitary District #1 Town of Hallie, Chippewa County, Wisconsin with cover letter attached	Sippel, Town of Hallie Clerk		Other	144
	34	89/12/29	Annexations from the Town of Hallie into Eau Claire with cover letter attached	Spanel, City of Eau Claire	Martin, USEPA	Other	145
	47	86/07/08	Administrative Order by Consent with attach-ment 1 Statement of Work for Conducting a RI/FS at NPI	Adamkus, USEPA		Pleadings/Orders	146
	6	86/09/16	Findings of Fact, Con-clusions of Law, and Order with cover letter attached	Curtner, WDNR	Bartl, NPI	Pleadings/Orders	147
	31	86/09/16	Order that finds NPI, Inc. responsible for the groundwater contamination around its plant in Chippewa County and also includes requirements and maps	Curtner, WDNR	Bartl, NPI, Inc.	Pleadings/Orders	148

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	3	86/10/21	NPI v. DNR: Stipulation and Order with memo attached	Eggleson, WDNR	Hanz, Curtner, etc. - WDNR	Pleadings/Orders	149
	4	89/02/16	Before the State of Wisconsin Division of Hearings and Appeals Interim Order: update on 9/16/86 order issued to NPI	Currie, WI Div. of Hearings and Appeals		Pleadings/Orders	150
	54	89/04/25	Unilateral Order & Statement of Work requiring NPI to conduct a PFS and provide bottled water to the affected area, with cover letters to NPI and WDNR attached	Constantelos, USEPA	Bartl, NPI, Inc.	Pleadings/Orders	151
	21	89/05/05	Letter forwarding written comments regarding the determi-nation and findings, procedural aspects and legal provisions of the Order	Bartl, NPI, Inc.	Gifford, USEPA	Pleadings/Orders	152
	18	89/09/20	Certification and the Order establishing Sanitary District #1 Town of Hallie Chippewa County, WI with letter and Hallie Water District Project Schedule attached	Sippel, Town of Hallie Clerk		Pleadings/Orders	153

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	7	89/12/29	Letter forwarding a copy of Stipulation and Judgment Upon Stipulation regarding a portion of land in the Town of Hallie	Raihle, Hallie Town Atty	Gifford, USEPA	Pleadings/Orders	154
	6	86/05/13	News Release: Waste in two disposal areas have been linked to contamination of private wells in the Town of Hallie	WDNR		Press Release	155
	3	86/05/14	NPI released a statement regarding the identification of possible sources of well contamination in the Town of Hallie	National Presto Industries, Inc.		Press Release	156
	2	86/06/09	EPA seeks public comment on NPI Agreement	USEPA		Press Release	157
	2	86/06/09	NPI announced that it will be undertaking at its own expense, a comprehensive environmental study of its Eau Claire, WI site	National Presto Industries, Inc.		Press Release	158
	2	86/09/16	Officials of NPI were shocked to learn that the WDNR had issued an Administrative Order seeking the replacement of certain private water supplies in the Town of Hallie	National Presto Industries, Inc.		Press Release	159

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	4	86/09/17	National Presto Industries, Inc. is to receive an Administrative Order from WDNR requiring the firm to study ground-water contamination plumes from its property	WDNR		Press Release	160
	1	87/10/16	EPA to hold Public Meeting on NPI	USEPA - Region V		Press Release	161
	1	89/03/22	EPA, Wisconsin to Hold Meeting on NPI April 5, 1989	USEPA		Press Release	162
	1	89/04/25	EPA Orders NPI to Supply Bottled Water, Conduct Survey	USEPA		Press Release	163
	2	89/05/11	NPI to Provide Bottled Water in Hallie	USEPA		Press Release	164
	1	89/08/15	EPA to Discuss NPI Superfund Site Aug. 23, 1989	USEPA		Press Release	165
	2	86/08/11	Progress Report No. 1 for National Presto Industries with cover letter attached	Warren, Eder Associates	Mains, USEPA	Reports/Studies	166
	2	86/09/12	Progress Report No. 2 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Mains, USEPA	Reports/Studies	167

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	2	86/10/08	Progress Report No. 3 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Mains, USEPA	Reports/Studies	168
	2	86/11/11	Progress Report No. 4 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Mains, USEPA	Reports/Studies	169
	2	86/12/11	Progress Report No. 5 for NPI, Inc. with cover letter attached	Warren, Eder Associates Consulting Engineers, P.C.	Mains, USEPA	Reports/Studies	170
	2	87/01/06	Progress Report No. 6 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	171
	2	87/02/09	Progress Report No. 7 for National Presto Industries, Inc. with cover letter attached	Eder Associates	Gifford, USEPA	Reports/Studies	172
	8	87/02/24	Review of QAPP for the RI/FS at the NPI site with memo attached	Adams, Jr., USEPA	Niedergang, USEPA	Reports/Studies	173
	3	87/03/16	Progress Report No. 8 for National Presto Industries, Inc. with cover letter	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	174
	17	87/04/10	Progress Report No. 9 for National Presto Industries, Inc. with cover letter and field notes attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	175

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	2	87/05/13	Progress Report No. 10 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	176
	3	87/06/10	Progress Report No. 11 for National Presto Industries, Inc. with Air Pollution article and cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	177
	31	87/06/19	Performance Evaluation for PACE Laboratories Report with memo attached	Adams, Jr., USEPA	Niedergang, USEPA	Reports/Studies	178
	2	87/07/10	Progress Report No. 12 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	179
	4	87/08/10	Progress Report No. 13 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	180
	2	87/09/11	Progress Report No. 14 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	181
	8	87/09/15	Review of QAPP for the RI/FS Activity at the NPI site with memo attached	Adams, Jr., USEPA	Niedergang, USEPA	Reports/Studies	182
	13	87/09/23	Letter forwarding review comments, previously mailed to Mr. Richard Nauman of NPI, Inc.	Carlock, DOD	Gifford, USEPA	Reports/Studies	183

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	2	87/10/09	Progress Report No. 15 RI/FS/Remedial Measure for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	184
	12	87/10/28	Comments provided after site inspection of sampling procedures by National Presto Industries Contractor - Eder Assoc. during 10/5-6/87 and 10/20-21/87 with cover letter attached	Carlock, DOD	Gifford, USEPA	Reports/Studies	185
	4	87/10/29	Letter forwarding Comments on the Health and Safety Plan dated Oct. 1987	Carlock, DOD	Gifford, USEPA	Reports/Studies	186
	38	87/10/29	Approval of QAPP for RI/FS at the NPI site with memo attached	Adams, Jr., USEPA	Niedergang, USEPA	Reports/Studies	187
	181	87/11/00	QAPP for RI/FS at NPI Site with cover letter attached	Eder Associates		Reports/Studies	188
	156	87/11/00	Health and Safety Plan Appendix B	Eder Associates Consulting Engr, P.C.	Nat'l Presto Industries	Reports/Studies	189
	26	87/11/09	Progress Report No. 16 for National Presto Industries, Inc. with cover letter, Phase I sampling notes, and photographs attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	190

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	9	87/11/10	A Summary of Region V personnel costs following the effective date of the Consent Order	Gifford, USEPA	Nauman, NPI, Inc.	Reports/Studies	191
	41	87/11/13	Transmittal memo from the Q&O to the CERCLA Enforcement Section which discusses the necessary changes in Appendix A of the QAPP for the RI/FS at NPI, Site with cover letter attached	Gifford, USEPA	Nauman, NPI, Inc.	Reports/Studies	192
	64	87/11/23	Work Plan for Conducting a RI/FS with cover letter attached	Eder Associates	Gifford, USEPA	Reports/Studies	193
	14	87/12/04	U.S. Army Corps of Engineers comments on National Presto Industries' Progress Report N. 16 with cover letter attached	Carlock, DOD	Gifford, USEPA	Reports/Studies	194
	2	87/12/14	Progress Report No. 17 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	195
	2	88/01/13	Progress Report No. 18 for National Presto Industries with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	196
	8	88/01/26	NPI RI/FS Oversight Field Notes of RI Activities by USEPA contractor with cover letter attached	Schoepke, Metcalf & Eddy	Gifford, USEPA	Reports/Studies	197

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	41	88/02/17	Progress Report No. 19 for National Presto Industries with Phase II report, photos, and cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	198
	10	88/03/14	Progress Report No. 20 for National Presto Industries with tables and cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	199
	16	88/03/10	VOC Organics Procedure by GC/ES Purge and Trap Method for Spent Forging Compound Samples with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	200
	17	88/03/31	Administrative Record Index Eau Claire Municipal Well Field Site, Eau Claire, WI	Davis, DPRA	Allans, USEPA	Reports/Studies	201
	2	88/04/13	Progress Report No. 21 for National Presto Industries with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	202
	2	88/05/16	Progress Report No. 22 for National Presto Industries with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	203
	31	88/05/23	Oversight Field Notes of RI activities by USEPA contractor with transmittal attached	Schoepke, Metcalf & Eddy	Gifford, USEPA	Reports/Studies	204
	42	88/06/00	Final Community Relations Plan, National Presto Industries Site	Jacobs Engineering Group Inc.	USEPA	Reports/Studies	205

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	3	88/06/14	Progress Report No. 23 for National Presto Industries with cover letter and drawing attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	206
	2	88/07/11	Progress Report No. 24 for National Presto Industries with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	207
	76	88/07/25	Memo re: The Approval of the SOP for the Analysis of Volatile Organic Compound (VOC), Semi-Volatile Organics and Pesticide/PCBs in spent Forging Compound samples collected at NPI with the VOC Procedure by GC/ES attached	Jirks, USEPA	Dikinis, USEPA	Reports/Studies	208
	22	88/07/29	Response to Eau Claire Municipal Well Field RI/FS and ROD with cover letter attached	Bartl, NPI, Inc.	Gifford, USEPA	Reports/Studies	209
	32	88/08/17	Progress Report No. 25 for National Presto Industries with cover letter and field notes attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	210
	6	88/08/19	Letter forwarding a copy of the Analytical Proposal for Analysis of drinking water	Graham, Wadsworth/Alert Laboratories, Inc.	Gifford, USEPA	Reports/Studies	211
	2	88/08/23	Corrected first page of Progress Report No. 25 with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	212

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	2	88/09/14	Progress Report No. 26 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	213
	4	88/10/00	RI Progress Report for NPI, Inc. Eau Claire, WI	USEPA		Reports/Studies	214
	34	88/10/06	Revised SOP for the Analysis of Semi-Volatiles with low Detection Limits with cover letter attached	Graham, Wadsworth/Alert Laboratories, Inc.	Gifford, USEPA	Reports/Studies	215
	2	88/10/11	Progress Report No. 27 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	216
	36	88/10/19	Memo forwarding the Approval of the SOP for the Analysis of Extractable Organics in Drinking Water samples	Jirks, USEPA	Niedergang, USEPA	Reports/Studies	217
	42	88/11/15	Progress Report No. 28 for National Presto Industries, Inc. with cover letter, field notes, and location map attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	218
	2	88/12/16	Progress Report No. 29 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	219

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	9	89/01/17	Progress Report No. 30 for National Presto Industries, Inc. with cover letter and groundwater results	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	220
	32	89/02/02	Summary comments relating to the analytical results and quality control with cover letter attached	Richter, Hazelton Labs	Warren, Eder Associates	Reports/Studies	221
	2	89/02/14	Progress Report No. 31 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	222
	64	89/03/00	Draft Addendum No. 1 to RI Work Plan	Eder Associates		Reports/Studies	223
	2	89/03/13	Progress Report No. 32 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	224
	15	89/03/27	Preliminary: Health Assessment for National Presto Industries, Inc. Eau Claire, WI	Wisconsin Div. of Health	ATSDR	Reports/Studies	225
	25	89/04/06	RI/FS Oversight Field Notes of RI Activities from USEPA contractor	Jacobs Engineering Group, Inc.	USEPA	Reports/Studies	226
	3	89/04/13	Progress Report No. 33 for National Presto Industries, Inc. with cover letter and table attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	227

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	24	89/04/20	Appendix B: Amendment to QAPP with approval memo attached	Eder Associates		Reports/Studies	228
	6	89/04/28	Chain of custody records from PRPs contractor, Eder Associates, residential well samplings, and a summary of residential wells with cover letter attached	Geers, Jacobs Engineering	Gifford, USEPA	Reports/Studies	229
	6	89/05/12	Progress Report No. 34 for National Presto Industries, Inc. with cover letter and samples attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	230
	20	89/05/18	Bottled Water Distribution Plan with cover letter attached	Eder Associates		Reports/Studies	231
	27	89/05/23	Oversight Field Notes of RI activities from USEPA contractor	Terefenke, Metcalf & Eddy	Gifford, USEPA	Reports/Studies	232
	16	89/05/25	Phased Feasibility Study Work Plan with cover letter attached	Eder Associates		Reports/Studies	233
	6	89/05/30	Data Validation for April 1989 Private Well Sampling Results with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	234
	3	89/06/15	Progress Report No. 35 RI/FS/Remedial Measure for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	235

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	11	89/07/14	Progress Report No. 36 for National Presto Industries, Inc. with cover letter and maps attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	236
	7	89/07/18	Private Well Sampling and Monitoring Well Sampling field notes	NPI	Gifford, USEPA	Reports/Studies	237
	17	89/07/24	RI/FS Additional Soil Waste Sampling Procedures with cover letter attached	Eder Associates		Reports/Studies	238
	11	89/07/26	Oversight Field Notes of RI activities from USEPA oversight contractor	Bennett, Metcalf & Eddy		Reports/Studies	239
	27	89/08/08	Field Summary Notes RI/FS Oversight July 27-29, 1989 National Presto Site	Strimbs, Jacobs Engineering	Gifford, USEPA	Reports/Studies	240
	18	89/08/16	Progress Report No. 37 for National Presto Industries, Inc. with cover letter and tables	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	241
	3	89/09/11	Progress Report No. 38 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	242
	7	89/09/12	Comments on the RI/ FS Soil/Waste Sampling Procedures for NPI, Inc. with cover letter attached	Carlock, Corps of Engineer	Gifford, USEPA	Reports/Studies	243

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	3	89/10/13	Progress Report No. 39 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	244
	15	89/11/00	Proposed Plan NPI Site, Eau Claire, WI	USEPA		Reports/Studies	245
	50	89/11/08	Revised pages 40 through 87 of the PFS for NPI, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	246
	485	89/11/10	Phased Feasibility Study Evaluating Alternative Permanent Water Supply Systems with Appendices A-E and cover letter attached	Eder Associates	Gifford, USEPA	Reports/Studies	247
	3	89/11/13	Progress Report No. 40 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	248
	15	89/12/00	Addendum to the Phased Feasibility Study NPI Site, Eau Claire, WI	USEPA, WDNR	NPI Site File	Reports/Studies	249
	160	89/12/04	Sanitary District No. 1 Town of Hallie Water Utility Information for State Wisconsin Public Service Commission with transmittal attached	SEE-Engineers, Architects, & Planners	Gifford & Pastor, USEPA	Reports/Studies	250

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	2	89/12/08	Progress Report No. 41 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	251
	2	09/01/04	Progress Report No. 42 for National Presto Industries, Inc. with cover letter attached	Warren, Eder Associates	Gifford, USEPA	Reports/Studies	252

ADMINISTRATIVE RECORD SAMPLING/DATE INDEX
NATIONAL PRESTO SITE
DOCUMENTS NOT COPIED, MAY BE REVIEWED AT THE
USEPA REGION V OFFICES, CHICAGO, ILLINOIS.

DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE
00/00/00	"NPI's Contract Labs include, Wilson, Wadsworth-Alert, Hazelton, and PACE Laboratories			
87/02/20	Letter forwarding the Report of Laboratory Analysis od Spent Forge Compound Samples	Splinter, Ph.D., PACE Labs., Inc.	Nauman, NPI, Inc.	Sampling/Data
87/03/13	Letter forwarding the Report of Laboratory Analysis of Spent Forge Compound Samples received 8/7/86	Splinter, Ph.D., PACE Labs., Inc.	Nauman, NPI, Inc.	Sampling/Data
87/07/16	Correspondence re: Report of Laboratory Analysis for samples received 3/26/87	Splinter, Ph.D., PACE Labs., Inc.	Nauman, NPI, Inc.	Sampling/Data
87/10/00	Organic and Inorganic Analytical Data Packages for water and soil samples collected during 10/07	NPI's Contract Laboratories	Gifford, USEPA	Sampling/Data
88/01/00	Organic & Inorganic Data Packages for samples collected during 1/88	NPI's Contract Laboratories	Gifford, USEPA	Sampling/Data

DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE
88/10/00	Organic and Inorganic Data Packages for water, soil, and waste samples collected during the period of 7/88-10/88	NPI's Contract Laboratories	Gifford, USEPA	Sampling/Data
89/02/02	Letter forwarding Sample Results Tabulation	Richter, Hazleton Labs	Warren, Eder Associates	Sampling/Data
89/04/00	Organic Data Package for water samples collected during 4/89	NPI's Contract Laboratories	Gifford, USEPA	Sampling/Data
89/07/14	Raw Data submitted as part of Progress Report No. 36	Eder Associates	Gifford, USEPA	Sampling/Data
89/08/00	Organic Data Packages for water samples collected during 8/89	NPI's Contract Laboratories	Gifford, USEPA	Sampling/Data
89/09/00	Organic Data Packages for soil samples during to period 8/89-9/89	NPI's Contract Laboratories	Gifford, USEPA	Sampling/Data
89/10/00	Organic Data Packages for water samples collected during 10/89	NPI's Contract Laboratories	Gifford, USEPA	Sampling/Data
89/11/00	Organic Data Packages for water samples collected during 11/89	NPI's Contract Laboratories	Gifford, USEPA	Sampling/Data
89/11/00	Inorganic Data Packages for soil samples collected during 11/89	NPI's Contract Laboratories	Gifford, USEPA	Sampling/Data

NATIONAL PRESTO, EAU CLAIRE, WISCONSIN
Guidance Documents for the Administrative Record
have not been copied but may be
Reviewed at the USEPA-Region V, Chicago, IL

TITLE	AUTHOR	DATE
Soil Sampling Quality Assurance User's Guide	Barth&Mason/U. of Nev Brown/ORD/EARD	84/05/01
Ground-Water Protection Strategy	Office of Ground-Water Protection	84/08/01
Field Standard Operating Procedures Manual #4- Site Entry	OERR/HRSD	85/01/01
Field Standard Operating Procedures Manual #8-Air Surveillance	OERR/HRSD	85/01/01
Modeling Remedial Actions of Uncontrolled Hazardous Waste Sites(Vol 1-4)	Boutwell, et.al./Anderson-Nicho ls&Co	85/04/01
Field Standard Operating Procedures manual #9-Site Safety Plan	OERR/HRSD	85/04/01
Field Standard Operating Procedures Manual #6-Work Zones	OERR/HRSD	85/04/01
RCRA/CERCLA Decisions made on Remedy Selection [Secondary Reference]	Kilpatrick/Compliance Branch, ONPN	85/06/24
Practical Guide for Ground-Water Sampling	Barcelona, M./ISWS Scalf, M./Ord/ERL	85/09/01
Chemical, Physical, & Biological Properties of Compounds Present at Hazardous Waste Sites	Clement Associates, Inc.	85/09/27
CERCLA Compliance with Other Environmental Statues	Porter, J.N./ONSER	85/10/02
Endangerment Assessment Guidance	Porter, J.N./OSWER	85/11/22

TITLE	AUTHOR	DATE
Endangerment Assessment Guidance [Secondary Reference]	Porter, J.N./OSWER	85/11/22
Endangerment Assessment Guidance	Porter, J.N./OSWER	85/11/22
Field Screening for Organic Contaminants in Samples from Hazardous Waste Sites	Roffman, et.al./Bus Corp, Carter/WDNR	86/04/02
ATSDR Health Assessment on NPL Sites	HHS/ATSKR	86/06/16
RCRA Ground-Water Monitoring Technical Enforcement Guidance Document (TEGD) [Secondary Reference]	EPA	86/09/01
Protocol for Ground-Water Evaluations	HWGWTF	86/09/01
Guidelines for Carcino-gen Risk Assessment (Federal Register, September 24, 1986, p. 33992)	EPA	86/09/24
Guidelines for Exposure Assessment (Federal Register, September 24, 1986, p. 34042)	EPA	86/09/24
Superfund Public Health Evaluation Manual	OERR/OSWER	86/10/01
Guidelines for Ground-Water Classification under the EPA Ground-Water Protection Strategy	Office of Ground-Water Protection	86/12/01
Interim Guidance on Superfund Selection of Remedy	Porter, J.N./OSWER	86/12/24
Data Quality Objectives for Remedial Response Activities: Development Process	CDN Federal Programs Corp/OERR/ONPE	87/03/01

TITLE	AUTHOR	DATE
Data Quality Objectives for Remedial Response Activities: Example Scenario: RI/FS Activities at a Site with Contaminated Soils and Groundwater	CDN Federal Programs Corps/OERR/ONPE	87/03/01
Quality Criteria for Water 1986	Off. of Water Regulations&Standards	87/05/01
Final Guidance for the Coordination of ATSDR Health Assessment Activities with the Superfund Remedial Process	Porter, J.N./OSWER/OERR/ATSDR	87/05/14
EPA's Implementation of the Superfund Amendments and Reauthorization Act of 1986	Thomas, L.M./EPA	87/05/21
Guidelines and Specifications for Preparing Quality Assurance Program Documentation	ORD/Quality Assurance Mgmt. Staff	87/06/01
RCRA Ground-Water Monitoring Technical Enforcement Guidance Document, TEGD: Executive Summary [Secondary Reference]	Lucero, G.A./ONPN	87/07/01
RI/FS Improvements	Longest, H.L./OERR	87/07/23
A Compendium of Superfund Field Operations Methods	OERR/ONPN	87/12/01
Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses	Bleyler, R./Viar&Co./EPA DRW/HSED	88/02/01
Gudiance Document for Providing Alternate Water Supplies	OERR	88/02/01
Superfund Exposure Assessment Manual	OERR	88/04/01
Information on Drinking Water Action Levels	Fields, Jr., T./OSWER/ERD	88/04/19

TITLE	AUTHOR	DATE
Information on Drinking Water Action Levels [Secondary Reference]	Fields, Jr., T./OSWER/ERD	88/04/19
RI/FS Improvements Follow-up	Longest, H.L./OERR	88/04/25
Interim Guidance on Potentially Responsible Party Participation in Remedial Investigations and Feasibility Studies	Porter, J.N./OSWER	88/05/16
Community Relations in Superfund: A Handbook (Interim Version)	OERR	88/06/01
Laboratory Data Validation Functional Guidelines for Evaluating Inorganics Analyses	EPA Data Review Work Group/NSED/	88/07/01
CERCLA Compliance with Other Laws Manual	OERR	88/08/03
Field Screening Methods Catalog: User's Guide	OERR/HSED	88/09/01
Gudiance for Conducting Remedial Investigations and Feasibility Studies under CERCLA	OSWER/OERR	88/10/01
User's Guide to the Contract Laboratory Program	OERR/CLP Sample Management Office	88/12/01
	ONPN/PRC-Environmental Mgmt, Inc.	89/05/01

ACRONYM LIST FOR NATIONAL PRESTO - EAU CLAIRE, WISCONSIN

AO	Administrative Order
AR	Administrative Record
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CLP	Contract Laboratory Program
DHSS	Department of Health and Social Services
DOD	Department of Defense
FS	Feasibility Study
HSL	Hazardous Substance List
NPL	National Priority List
PE	Performance Evaluation
PFS	Phased Feasibility Study
QA/QC	Quality Assurance/Quality Control
QAO	Quality Assurance Officer
QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
RPM	Remedial Project Manager
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
SOP	Standard Operating Procedure
TAT	Technical Assistance Team
TES	Technical Enforcement Support
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
WDNR	Wisconsin Department of Natural Resources

ADMINISTRATIVE RECORD INDEX - UPDATE #1
NATIONAL PRESTO INDUSTRIES SITE
EAU CLAIRE, WISCONSIN

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	89/12/29	Letter forwarding a copy of Stipulation and Judgment Upon Stipulation re: a portion of land in the Town of Hallie	D. Raihle-Town of Hallie Attorney	M. Gifford-USEPA	Correspondence	1
	2	90/01/29	Letter re: Proposals and comments submitted with regard to the Phased Feasibility Study	E. Anderson-City of Eau Claire Manager	M. Gifford-USEPA	Correspondence	2
	3	90/02/05	Letter re: Confirming that in order for USEPA and WDNR to determine if the City of Eau Claire's proposal is a viable alternative for providing a permanent water supply to the affected area, additional information is needed	M. Gifford-USEPA	E. Anderson-Eau Claire City Manager	Correspondence	3
	1	90/02/08	Letter re: Response to a Feb. 6, 1990 article in the Chippewa Falls Herald-Telegram titled "Hallie sidetracks Eau Claire offer."	M. Gifford-USEPA	D. Raihle-Hallie Town Atty	Correspondence	4

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	3	90/02/12	Letter re: Response to the 2/5/90 letter. with memo attached outlining the City's understanding and position on the issues raised	E. Anderson-City of Eau Claire Manager	M. Gifford-USEPA	Correspondence	5
	52	90/02/12	Letter re: Alternative Proposals for Permanent Water Supply in Town of Hallie, Chippewa County, WI, with attachments which will serve as comments to the Phased Feasibility Study	D. Neier-Town of Hallie Chairman	USEPA	Correspondence	6
	10	90/02/13	Letter re: Eau Claire's proposal to extend water services to the Town of Hallie without requiring annexation, with a copy of USEPA's 2/5/90 letter to Eric Anderson, City of Eau Claire Manager and 2/12/90 response attached	M. Gifford-USEPA	D. Neier-Hallie Chairman	Correspondence	7
	1	90/02/13	Letter re: Request for the EPA to extend the public comment period, due to the number of questions and issues that the City of Eau Claire's announcement (of their willingness to extend municipal water services into the Town of Hallie) generated	R. Nauman-NPI Project Coordinator	M. Gifford-USEPA	Correspondence	8

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	2	90/02/13	Letter re: Sanitary District #1 is prepared to proceed with resolution in 1990 and is looking forward to a ROD at the earliest time permitted	D. Raihle-Town of Hallie Attorney	M. Gifford-USEPA	Correspondence	9
	5	90/02/14	Letter forwarding a copy of a resolution adopted by the Eau Claire City Council at its meeting on 2/13/90	E. Anderson-City of Eau Claire Manager	M. Gifford-USEPA	Correspondence	10

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	2	90/02/16	Letter re: Many residents living in the affected area favored creation of the Hallie Sanitary District because they were misled to think that all the District's cost would be paid by EPA or RP under EPA's order: NPI presents its position and understanding of the issues	R. Nauman-NPI Project Coordinator	Residents of Affected Area in the Town of Hallie	Correspondence	11
	1	90/02/16	Letter re: Confirming that the public comment period would be extended to March 5, 1990	R. Nauman-NPI Project Coordinator	M. Gifford-USEPA	Correspondence	12
	2	90/02/22	Letter re: Phased FS for a Permanent Alternate Water Supply for the Affected Area in the Town of Hallie	D. Raihle-Town of Hallie Attorney	M. Gifford-USEPA	Correspondence	13
	9	90/02/22	Letter forwarding 2 other letters written by NPI, sent to the area residents before the meetings, dated Jan. 15, 1990, (2) Sept. 1, 1989, and July 26, 1989	D. Pahl-Concerned Area Resident	M. Gifford-USEPA	Correspondence	14
	5	90/02/27	Letter re: Response to area resident expressing her views on the content and timing of material sent to Hallie residents by NPI and VOC sample results	J. Boettcher-WDNR	D. Pahl-Concerned Resident	Correspondence	15

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	90/03/01	Letter re: Comments submitted during the public comment period: Comments included two bound copies of testimony and exhibits and correspondence between the City and USEPA	T. Fischer-City of Eau Claire Attorney	S. Pastor-USEPA	Correspondence	16
	30	90/03/01	Letter forwarding material which will serve as the comment by the City of Chippewa Falls re: proposed alternatives to address the Hallie Well Contamination Impact Area situation	G. Sazana-City of Chippewa Falls Attorney	S. Pastor-USEPA	Correspondence	17
	33	90/03/05	Letter forwarding Comments of NPI to December 1989 USEPA Addendum to Phased FS and Proposed Plan re: Alternative Drinking Water Supply for Affected Area in the Town of Hallie: Comments included bound copies of testimony and exhibits also submitted by the City of Eau Claire	J. Bartl-National Presto Industries, Inc.	S. Pastor-USEPA	Correspondence	18
	3	90/03/06	Letter forwarding a copy of a letter sent to Governor Thompson relating to the Town of Hallie Sanitary District	J. Boettcher-WDNR	M. Gifford-USEPA	Correspondence	19

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	90/03/09	Letter re: Confirmation of conversation with William Warren, which formally requests that the deadline for submitting the NPI draft RI report be postponed from March 15 to March 23, 1990	G. Rozmus-Eder Associates	M. Gifford-USEPA	Correspondence	20
	1	90/03/14	Letter re: Extension to March 23, 1990 is granted for the draft Risk Assessment for the NPI site	M. Gifford-USEPA	G. Rozmus-Eder Associates	Correspondence	21
	1	90/03/14	Letter forwarding 5 copies of the Draft RI report for the NPI site in Eau Claire	W. Warren-Eder Associates	M. Gifford-USEPA	Correspondence	22
	1	90/03/22	Letter forwarding 5 copies of the Executive Summary, Section 6.0-Baseline Risk Assessment and Section 7.0 - Summary August 1, 1990, ROD with attachment	G. Rozmus-Eder Associates	M. Gifford-USEPA	Correspondence	23
	2	90/08/23	Letter Re: Replacement pages for NPI's response to ROD	Libby Stupak, NATIONAL PRESTO INDUSTRIES	M. Gifford-USEPA	CORRESPONDENCE	8
	7	90/08/23	Letter Re: Letter dated March 1989 from NPI to USEPA with attachment	David N. Raihle, TOWN OF HALLIE	J. Bartl, NPI	CORRESPONDENCE	9

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	90/08/31	Letter Re: Response to letter dated August 7, 1990 concerning the ROD and its implementation	James F. Bartl, NATIONAL PRESTO INDUSTRIES	D. Neier, TOWN OF HALLIE	CORRESPONDENCE	10
	1	90/08/31	Letter Re: Response to letter dated August 23, 1990 concerning the selected remedy and its implementation	James F. Bartl, NATIONAL PRESTO INDUSTRIES	D. Raihle, TOWN OF HALLIE	CORRESPONDENCE	11
	1	90/09/04	Letter Re: Conversation on August 24, 1990	Lewis D. Walker, DEPARTMENT OF THE ARMY (DOA)	J. Bartl, NPI	CORRESPONDENCE	12
	6	90/09/07	Letter Re: Response to letter dated July 31, 1990 with attachments	Valdas V. Adamkus, UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA)	T. Thompson, GOV. OF WIS.	CORRESPONDENCE	13
	2	90/09/13	Letter Re: Request to extend option on the purchase of the property for Sanitary District well & reservoir	David N. Raihle, TOWN OF HALLIE	See Document	CORRESPONDENCE	14
	3	90/09/19	Letter Re: Engineering Services to be provided to City of Eau Claire	Duane Munson, AYRES ASSOCIATES (AA)	R. Nauman, NPI	CORRESPONDENCE	15
	1	90/10/05	Letter Re: Efforts of urgency to implement remedial design	Lewis D. Walker, DEPARTMENT OF THE ARMY	J. Bartl, NPI	CORRESPONDENCE	16

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	2	90/10/17	Letter Re: Implementation of August 1, 1990 ROD	Michael A. Gifford, USEPA	L. Walker, DOA	CORRESPONDENCE	17
	3	90/10/19	Letter Re: Meeting of September 5, 1990 in Eau Claire and progress subsequent to that meeting	James F. Bartl, NATIONAL PRESTO INDUSTRIES	L. Johnson, USEPA	CORRESPONDENCE	18
	926	90/10/19	Letter Re: Revised Draft Remedial Investigation (RI) Report With Exhibit Enclosures: A-1 through D-5 (SEE COVER LETTER FOR DETAILED DESCRIPTIONS)	Richard Nauman, NATIONAL PRESTO INDUSTRIES	M. Gifford-USEPA	CORRESPONDENCE	19
	1	90/10/23	Letter Re: Letter of appreciation Sanitary District #1 with attachments	David Neier, TOWN OF HALLIE	M. Gifford-USEPA	CORRESPONDENCE	20
	2	90/10/25	Letter Re: Design of the Replacement Drinking Water Supplies for the Affected Area	Michael A. Gifford, USEPA	Nauman/Neier/ Anderson	CORRESPONDENCE	21
	2	90/10/29	Letter Re: Delineation of Final Affected Area with attachment	Clarence Stoffel, SHORT ELLIOTT HENDRICKSON, INC. (SEH)	M. Gifford-USEPA	CORRESPONDENCE	22
	1	90/11/06	Letter Re: Request to share engineering work in the "affected area"	David H. Raihle, TOWN OF HALLIE	J. Bartl, NPI	CORRESPONDENCE	23

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	8	90/11/07	Letter Re: Memorandum of Understandings with attachments	Richard A. Nauman, NATIONAL PRESTO INDUSTRIES	M. Gifford-USEPA	CORRESPONDENCE	24
	12	90/11/09	Letter Re: USEPA and WDNR comments on the Revised Draft Remedial Investigation (RI) Report	Michael. A. Gifford, USEPA	R. Nauman, NPI	CORRESPONDENCE	25
	1	90/11/29	Letter Re: Funding Sanitary District #1	David H. Raihle, TOWN OF HALLIE	J. Bartl, NPI	CORRESPONDENCE	26
	1	90/12/04	Letter Re: Preliminary Plans for extension of Eau Claire Services into affected area	Duane Munson, AYRES ASSOCIATES	B. Amundson, CEC	CORRESPONDENCE	27
	2	90/12/07	Letter Re: Letter dated December 3, 1990 from NPI to Town of Hallie expressing disappointment in progress	David H. Raihle, TOWN OF HALLIE	J. Bartl, NPI	CORRESPONDENCE	28
	1	90/12/12	Letter Re: Northeast Water Improvements	Brian G. Amundson, CITY OF EAU CLAIRE (CEC)	D. Munson, AA	CORRESPONDENCE	29
	1	90/12/12	Letter Re: Status Update of Design Work	Richard A. Nauman, NATIONAL PRESTO INDUSTRIES	M. Gifford-USEPA	CORRESPONDENCE	30

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	4	90/12/12	Letter Re: Delineation of Final Affected Area in the Town of Hallie and City of Eau Claire	Michael A. Gifford, USEPA	C. Stoffel, SEN	CORRESPONDENCE	31
	1	90/12/13	Letter - Re: Location of the well and reservoir for the water system	Clarence Stoffel, SHORT ELLIOTT HENDRICKSON, INC.	R. Nauman, NPI	CORRESPONDENCE	32
	1	90/12/27	Letter Re: Omission from 90/12/14 submitted to WDNR	Duane Munson, AYRES ASSOCIATES	R. Baumeister, WDNR	CORRESPONDENCE	33
	1	91/01/04	Letter Re: Bids and Desire for final MOU	David F. Neier, TOWN OF HALLIE	J. Bartl, NPI	CORRESPONDENCE	34
	1	91/01/04	Letter Re: Alternative Drinking Water Supply for Affected Area	Richard A. Nauman, NATIONAL PRESTO INDUSTRIES	P. Nanz, WDNR	CORRESPONDENCE	35
	4	91/01/11	Letter Re: Submittal of additional information requested by WDNR	Duane Munson, AYRES ASSOCIATES	S. Winnen, WDNR	CORRESPONDENCE	36
	4	91/01/22	Letter Re: Status of Annexation Cases with Town of Hallie with attachments	Ted Fischer, CITY OF EAU CLAIRE	M. Gifford, USEPA	CORRESPONDENCE	37
	5	91/01/22	Letter Re: Status of Annexation Disputes with Town of Hallie with attachments	Ted Fischer, CITY OF EAU CLAIRE	J. Boettcher, WDNR	CORRESPONDENCE	38

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	3	91/01/24	Letter Re: Proposed City of Eau Claire annexations and Sanitary District's intentions with attachments	David N. Raihle, TOWN OF HALLIE	J. Boettcher, WDNR	CORRESPONDENCE	39
	14	91/01/25	Letter Re: Draft "Memorandum of Understanding" between NPI and Sanitary District for construction with attachments	Richard A. Nauman, NATIONAL PRESTO INDUSTRIES	M. Gifford, USEPA	CORRESPONDENCE	40
	2	91/01/25	Letter Re: Conditional approval of water main extensions in City of Eau Claire	Robert A. Baumeister, WISCONSIN DEPARTMENT OF NATURAL RESOURCES (WDNR)	C. Schumacher, CEC	CORRESPONDENCE	41
	2	91/01/25	Letter Re: Well Installation for Hallie Sanitary District	Lee Boushan, WDNR	T. Marks, SEN	CORRESPONDENCE	42
	8	91/01/25	Letter Re: Conditional approval of plans and specifications for Hallie Sanitary District with attachment	Bob Baumeister, WDNR	D. Neier, HSD	CORRESPONDENCE	43
	3	91/01/28	Letter Re: Construction of Alternative Water Supply	Michael A. Gifford, USEPA	E. Anderson/D. Neier	CORRESPONDENCE	44

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	91/01/29	Letter Re: Additional comments resulting form WDNR review of water main extensions	Robert A. Baumeister,	C. Schumacher, CEC	CORRESPONDENCE	45
	1	91/01/29	Letter Re: Additional comments resulting from WDNR review of water main extensions	Robert A. Baumeister, WDNR	D. Neier, TOWN OF HALLIE	CORRESPONDENCE	46
	9	91/01/29	Letter Re: Support information with attachments concerning Sanitary District Cost Estimates	Richard A. Nauman, NATIONAL PRESTO INDUSTRIES	M. Gifford, USEPA	CORRESPONDENCE	47
	1	91/02/07	Letter Re: Letter from USEPA dated January 28, 1991 not received by the Sanitary District	David H. Raihle, TOWN OF HALLIE	M. Gifford, USEPA	CORRESPONDENCE	48
	3	91/02/12	Letter Re: Concerns raised at a February 6, 1991 meeting at NPI	David Neier, TOWN OF HALLIE	M. Gifford, USEPA	CORRESPONDENCE	49
	1	91/02/13	Letter Re: Design Parameters discussed at meeting on February 6, 1991	Michael A. Gifford, USEPA	L. Boushon, WDNR	CORRESPONDENCE	50
	2	91/02/13	Letter Re: Design Parameters discussed at meeting on February 6, 1991	Michael A. Gifford, USEPA	C. Stoeffel, SEN	CORRESPONDENCE	51

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	2	91/02/18	Letter Re: Providing response to 91/02/13 letter from USEPA	Tim Marks, SHORT ELLIOTT HENDRICKSON, INC.	M. Gifford, USEPA	CORRESPONDENCE	52
	1	91/02/20	Letter Re: Response to 91/02/13 letter from USEPA	Lee Boushan, WDNR	M. Gifford, USEPA	CORRESPONDENCE	53
	1	91/02/26	Letter Re: Needed fire flow for Chippewa Valley Mobile Home	Chris Moore, ISO COMMERCIAL RISK SERVICES, INC.	M. Gifford, USEPA	CORRESPONDENCE	54
			Re: Response to information request by USEPA	SHORT ELLIOTT HENDRICKSON, INC.			
	3	91/02/26	Letter Re: Looping of water mains in the proposed Town of Hallie distribution system with attachment	Lee Boushan, WDNR	M. Gifford, USEPA	CORRESPONDENCE	56
	10	91/01/00	Drawings Re: Sanitary District No. 1 Maintenance Shop Project No. 91147	SHORT ELLIOTT HENDRICKSON, INC.		DRAWINGS/DIAGRAMS	57
	41	91/01/15	Drawings Re: Sanitary District No. 1 Town of Hallie Construction Plans for Water Distribution System Contract, I, II, III, IV, & V	SHORT ELLIOTT HENDRICKSON, INC.		DRAWINGS/DIAGRAM	58

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	23	91/12/00	Drawings Re: Northeast Water Improvements Eau Claire, Wis. Procurement No. 9067	AYRES ASSOCIATES		DRAWINGS/DIAGRAMS	59
	2	90/09/05	Meeting Agenda and Attendance Sheet	USEPA		MEETING NOTES	60
	3	91/02/07	Assumptions and Maintenance Needs for Hallie Sanitary District	Steve Thon, WDNR	M. Gifford, USEPA	MEETING NOTES	61
	5	90/08/28	Memo Re: August 22, 1990 meeting with Department of Army at Pentagon with attachment	Michael A. Gifford, USEPA	NPI File	MEMORANDUM	62
	1	91/02/22	Memo Re: Review of Design Plans and Specifications for Town of Hallie & City of Eau Claire	Tom Williams, USEPA	M. Gifford, USEPA	MEMORANDUM	63
	5	91/02/25	Memo Re: Standard Guidelines for establishing fire protection needs with attachments	Michael A. Gifford, USEPA	File	MEMORANDUM	64
	8	91/02/27	Memo Re: USEPA approval of remedial design for Operable Unit at the NPI Site with attachment	Michael A. Gifford, USEPA	File	MEMORANDUM	65

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	-	91/03/00	Unilateral Order requiring NPI & National Defense Corporation (NDC) to implement Action for alternate drinking water supplies in the Affected Area with Appendices and cover letters to NPI & WDNR attached	D. Ullrich, USEPA	NPI/NDC	PLEADINGS/ORDERS	66
	24	90/07/00	Excerpt from Draft RI Report, Volume 1	EDER ASSOCIATES		REPORTS/STUDIES	67
	130	90/08/01	Record of Decision, Including Responsiveness Summary	USEPA		REPORTS/STUDIES	68
	184	90/09/19	Project status report of Sanitary District in support of finalizing "Memorandum of Understanding" with cover letter	SHORT ELLIOTT HENDRICKSON, INC.	NPI/USEPA/DOA	REPORTS/STUDIES	69
	87	90/11/06	Well and Reservoir Site Selection with cover letter	Clarence Stoffel, SHORT ELLIOTT HENDRICKSON, INC.	WDNR	REPORTS/STUDIES	70
	106	90/12/14	Plans & Specifications for Northeast Water Improvements Eau Claire, WI with cover letter	AYRES ASSOCIATES		REPORTS/STUDIES	71

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	412	90/12/28	Water Supply and Distribution System Design Report and Specifications (Preliminary) SEN File: 90111 and 90097 for Water Distribution System with cover letter	Timothy M. Marks, SHORT ELLIOTT HENDRICKSON, INC.	L. Boushan, WDNR	REPORTS/STUDIES	72
	382	91/01/00	Specifications SEN File: 91147 Sanitary District Maintenance Shop	SHORT ELLIOTT HENDRICKSON, INC.		REPORTS/STUDIES	73
			Specifications, including Bid Form SEN File: 90097 and 90111	HENDRICKSON, INC.			

ACRONYM GUIDE FOR THE ADMINISTRATIVE RECORD
UPDATE #3
NATIONAL PRESTO SITE
EAU CLAIRE, WISCONSIN

ACRONYM	DEFINITION
AA	AYRES ASSOCIATES
CEC	CITY OF EAU CLAIRE
DOA	DEPARTMENT OF THE ARMY
HSD	HALLIE SANITARY DISTRICT
NDC	NATIONAL DEFENSE CORPORATION
NPI	NATIONAL PRESTO INDUSTRIES, INC.
RI	REMEDIAL INVESTIGATION
ROD	RECORD OF DECISION
SEH	SHORT ELLIOTT HENDRICKSON, INC.
USEPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WDNR	WISCONSIN DEPARTMENT OF NATURAL RESOURCES

ADMINISTRATIVE RECORD INDEX - UPDATE #1
NATIONAL PRESTO INDUSTRIES SITE
EAU CLAIRE, WISCONSIN

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
			and Conclusions of the Draft RI report for the NPI site				
	3	90/04/06	Letter re: Response to the March 3, 1990 letter concerning the selection of a perma-nent and safe water supply for the affected area in the Town of Hallie	T. Adamkus-USEPA	D. Obey-House of Reps.	Correspondence	24
	1	90/04/06	Letter re: Response to letter concerning water supply for the Town of Hallie	T. Thompson-Governor of Wisconsin	Frank & Delores Woodford	Correspondence	25
	4	90/04/06	Letter forwarding a copy of the Memorandum of Understanding executed by the City of Eau Claire, NPI, and the U.S. Dept. of Army	R. Nauman-NPI, Inc.	M. Gifford, USEPA	Correspondence	26

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	2	90/04/07	Letter forwarding a fact sheet on trichloro-ethylene. fact sheet on potential health hazards posed by the NPI and a copy of the newspaper article on advice presented (USEPA was copied on this correspondence and enclosures were not included)	K. Bro-WDNR	R. Folz	Correspondence	27
	5	90/04/24	Letter re: Comments on the National Presto Industries Draft RI Report dated March 1990	J. Boettcher-WDNR	M. Gifford, USEPA	Correspondence	28
	5	90/04/25	Letter forwarding the cost estimate for the extension of the City of Eau Claire water system to only the Shong annexation, with map attached	W. Warren-Eder Associates	M. Gifford, USEPA	Correspondence	29
	1	90/04/26	Letter re: USEPA and WDNR completed their preliminary reviews of the draft RI and Risk Assessment reports for NPI and disapproves	M. Gifford, USEPA	R. Nauman-NPI Project Manager	Correspondence	30

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	90/04/30	Letter re: Confirmation of recent telephone conversation in which the question was asked, whether the WI Dept. of Transportation could provide any assistance in acquiring land or easements or in providing use of highway right-of-way for the installation of a municipal water system	F. Wisner-WI Dept. of Transportation	M. Gifford, USEPA	Correspondence	31
	4	90/05/01	Letter re: Response to the questions: If a town refuses to permit an adjoining city to excavate under town highways. may the Office of the Commis-sioner of Transportation order such construction pursuant to section 96.16 of the WI Statutes and may a city condemn town property for purposes of installing and operating	F. Thomas Creeron III-WI Dept. of Justice	P. Nanz-WDNR	Correspondence	32
	3	90/05/07	Letter re: Application of Town of Hallie Sanitary District No. 1, Chippewa County, for Authority to Construct Water Supply Facilities and Operate as A Water Public Utility	C. Thompson-Secretary Wisc. Public Service Commission	Raihle, Atty for Town Hallie, Fischer, City of Eau Claire & Sazana, City of Chippewa Falls	Correspondence	33

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	14	90/05/14	Letter re: Comments on the Draft RI report for NPI Superfund Site, with Summary of Comments on Draft RI Report by George Kraft, WDNR-Madison attached	M. Gifford, USEPA	R. Nauman-NPI Project Manager	Correspondence	34
	1	90/05/18	Letter re: Request for Authorization to Proceed, interim financing and further engineering to implement the sanitary district	D. Neier-Town of Hallie Chairman	M. Gifford, USEPA	Correspondence	35
	3	90/05/18	Letter re: Final additional comments on National Presto Industries Draft RI Report dated March 1990	J. Boettcher-WDNR	M. Gifford, USEPA	Correspondence	36
	1	90/05/21	Letter re: NPI has reviewed USEPA's and WDNR's written comments on the draft RI report and fully intends to complete the RI in accordance with the comments and directives	M. Cohen-NPI President	M. Gifford, USEPA	Correspondence	37
	1	90/05/22	Letter re: USEPA and WDNR expresses their concern that NPI may not complete the RI as stated in the May 21, 1990 letter and the Statement of Commitment is attached	M. Gifford, USEPA	M. Cohen-NPI President	Correspondence	38

3	90/05/22	Letter re: Application of the Town of Hallie Sanitary District No. 1, Chippewa County, for Authority to Construct Water Supply Facilities and Operate as a Water Public Utility with map attached	E. Anderson-City of Eau Claire Manager	WI Public Service Commission	Correspondence	39
2	90/05/29	Letter forwarding the signed Statement of Commitment, which allow NPI to complete the RI	R. Nauman-NPI Project	M. Gifford, USEPA	Correspondence	40
2	90/05/29	Letter forwarding a map showing the locations chosen for two additional off-site well nests to be installed as part of NPI RI/FS	J. Boettcher-WDNR	M. Gifford, USEPA	Correspondence	41
2	90/05/30	Letter re: Confirmation that NPI will undertake the additional field work tasks listed and complete the revised RI report by 7/23/90	R. Nauman-NPI	M. Gifford, USEPA	Correspondence	42
2	90/06/04	Letter forwarding the following list of monitoring wells to be sampled	W. Warren-Eder Associates	M. Gifford, USEPA	Correspondence	43
4	90/06/08	Letter re: Annexation from Town of Hallie, with annexation petition and composite map attached	T. Reiter-City of Eau Claire, Project Coordinator	M. Gifford, USEPA	Correspondence	44

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	90/06/22	Letter re: Adding bedrock monitoring wells MW-7 and MW-17C to the list of monitoring wells for slug testing proposed in the June 4, 1990 letter	W. Warren-Eder Associates	M. Gifford, USEPA	Correspondence	45
	1	90/07/10	Letter re: Confirmation of telephone conversation in which the conditions by which a municipality in the State of Wisconsin can provide municipal drinking water outside its corporate boundaries was discussed	M. Gifford, USEPA	S. Levine-Wisconsin Public Serv. Commission	Correspondence	46
	2	90/07/19	Letter re: Confirming phone conversation about Andrew Podowski's risk assessment calculations for drinking groundwater from the contaminated area in the Town of Hallie north of the NPI site	K. Bro-Wisconsin Dept. of Health and Social Services	M. Gifford, USEPA	Correspondence	47
	1	90/07/20	Letter re: Understanding expressed in previous letter concerning Eau Claire's water services beyond municipal boundaries is correct	S. Levine-Wisconsin Public Service Commission	M. Gifford, USEPA	Correspondence	48

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	3	90/07/24	Letter re: The Army has a direct financial interest in the cleanup involving the NPI site and has an obligation to insure that all monies expended on environmental restoration are utilized in accordance with those congressional directives: important that the ROD take into consideration and resolve issues re: this matter	L. Walker-Deputy Asst. Secretary of the Army	M. Gifford, USEPA	Correspondence	49
	2	90/06/19	Annexations from Town of Hallie into Eau Claire, with map attached	City of Eau Claire	M. Gifford, USEPA	Maps	50
	1	90/01/18	Public Meeting Notice NPI Superfund Site Proposed Plan for Hallie Permanent Water Supply Thursday, Jan. 18, 1990	USEPA		Meeting Notes	51
	2	90/01/05	Memo re: Water Division Review of the Draft Proposed Plan for the NPI, Inc. Site Eau Claire, Wisconsin	C. Sutfin-USEPA	B. Constantelos, USEPA	Memorandum	52
	4	90/02/27	Letter forwarding a copy of the Memorandum of Understanding between the City of Eau Claire and NPI	T. Fischer-City of Eau Claire Attorney	M. Gifford, USEPA	Memorandum	53

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	2	90/04/03	Memo re: Condemnation Authority of the Transportation Commis-sion and Cities	P. Nanz-WDNR	T. Creeron-WDNR	Memorandum	54
	4	90/04/18	Memo re: Water Division Review of the Draft RI Baseline Risk Assessment Report for the NPI Superfund Site, Eau Claire WI	D. Bryson-USEPA	D. Ullrich-USEPA	Memorandum	55
	1	90/04/18	Memo re: The draft RI for NPI has been reviewed by RCRA for ARARs	J. Kleiman-USEPA	M. Gifford, USEPA	Memorandum	56
	7	90/04/18	Memo re: Technical Review of Draft RI and Baseline Risk Assessment Report of NPI Superfund Site	R. Kay-USEPA	M. Gifford, USEPA	Memorandum	57
	2	90/06/14	Memo re: Individual Home Treatment Devices for VOC Removal	L. Boushon-WDNR		Memorandum	58
	2	90/07/09	Memo re: Water Division Review of the Draft Record of Decision for the NPI Superfund Site Eau Claire, WI	D. Bryson-USEPA	D. Ullrich-USEPA	Memorandum	59

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	7	90/07/11	Memo re: Risk assessment calculations for Ground Water Ingestion Pathway for the NPI Superfund site, WI	A. Podowski-USEPA	M. Gifford, USEPA	Memorandum	60
	6	90/02/05	Notice of Public Hearing, Proposed Additions #3, #4, #5, and #6 to Sanitary District #1, Town of Hallie, Chippewa County, Wisconsin	S. Sippel-Clerk Town of Hallie		Other	62
	3	90/02/07	Notice of Investigation and Hearing and Asses-ment of Costs	J. Reynolds-Secretary to the Public Service Commission		Other	63
	11	90/03/01	Letter forwarding two annexations which are taking place in Feb. 1990	T. Reiter-City of Eau Claire, Project Coordinator	M. Gifford, USEPA	Other	64
	126	90/03/05	Comments provided by concerned area residents during the public comment period which extended from 1/4/90-3/590 re: the proposed plan for a permanent drinking water supply for the affected area	Concerned Area Residents & City Officials	S. Pastor-USEPA	Other	65
	24	90/03/07	Letter forwarding a copy of the Dept. of Defense/NPI Agreement	D. Raihle-Town of Hallie Attorney	M. Gifford, USEPA	Other	66

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	72	90/04/09	Post-Hearing Brief of Intervenors, City of Chippewa Falls, City of Eau Claire and NPI	P. Peshek-NPI/G. Sazana-City of Chippewa Falls Attorney/T. Fischer, City of Eau Claire Attorney	Wisconsin Public Service Commission	Other	67
	11	90/03/06	Letter forwarding the Certification, Order, and Findings and Decision to include Additions #3, #4, #5, and #6 within Sanitary District #1, Town of Hallie	D. Raihle-Town of Hallie Attorney	M. Gifford, USEPA	Pleadings/Orders	68
	2	89/12/20	News Release: EPA Seeks Comments on Presto Study: Public Meeting Jan. 18, 1990	USEPA		Press Release	69
	2	90/02/15	WDNR News Release: Public Service Commission hearing at 2 pm and 7 pm, for review of an applica-tion by the Town of Hallie Sanitary District 1 to provide water service in the Town	WDNR	USEPA	Press Release	70
	116	00/00/00	Volume I Testimony of City of Eau Claire Witnesses submitted as part of Eau Claire's 3/1/90 and NPI's 3/5/90 comments during the public comment period on USEPA's Proposed Plan	City of Eau Claire	USEPA	Reports/Studies	71

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	332	00/00/00	Volume II Exhibition of City of Eau Claire Witnesses submitted as part of Eau Claire's 3/1/90 and NPI's 3/5/90 comments during the public comment period on U.S. EPA's Proposed Plan	City of Eau Claire	USEPA	Reports/Studies	72
	105	89/11/00	Phased Feasibility Study Evaluating Alternative Permanent Water Supply Systems	Eder Associates	USEPA	Reports/Studies	73
	2	90/01/04	Progress Report No. 42 NPI December 1990 with cover letter attached	W. Warren-Eder Associates	M. Gifford, USEPA	Reports/Studies	74
	1	90/02/10	Newsletter No. 3 Sanitary District #1, Town of Hallie	Commissioners-Sanitary District #1, Town Hallie	USEPA	Reports/Studies	75
	3	90/02/15	Progress Report No. 43 NPI January 1990 with cover letter and table attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	76
	3	90/03/14	Progress Report No. 44 NPI February 1990, with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	77
	2	90/04/09	Progress Report No. 45 NPI March 1990 with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	78
	17	90/05/11	Review Comments for NPI Site Draft RI Report with cover letter attached	P. Dowd-Weston	M. Gifford-U.S. EPA	Reports/Studies	79

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	3	90/05/15	Progress Report No. 46 NPI April 1990 with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	80
	3	90/06/11	Progress Report No. 47 NPI May 1990 with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	81
	3	90/07/16	Progress Report No. 48 June 1990 NPI with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	82
	96	90/01/19	Transcript from USEPA's Public Hearing concerning Superfund Site Proposed Plan for Hallie Permanent Water Supply, held 1/18/90 at 7:00pm	P. Gillman-Registered Professional Reporter Notary Public, State of Wisconsin	USEPA	Transcripts	83
	332	90/02/19	Transcript of the Public Hearing held by the Wisconsin Public Service Commission February 19, 1990 Chippewa Falls, WI 2:00pm and 7:00pm	A. Felic-Wisconsin Public Service Commission, Reporter		Transcripts	84

GUIDANCE INDEX for NATIONAL PRESTO INDUSTRIES - UPDATE #1
Guidance Documents for the Administrative Record
have not been copied, but may
reviewed at U.S.EPA-Region V Office, Chicago IL

TITLE	AUTHOR	DATE
Field Standard Operating Procedures Manual #4-Site Entry	OERR/HRSD	85/01/01
Field Standard Operating Procedures Manual #8-Air Surveillance	OERR/HSOD	85/01/01
Modeling Remedial Actions at Uncontrolled Hazardous Waste Sites(Vol 1-4)	Boutwell, et.al./Anderson-Nichols&Co	85/04/01
Field Standard Operating Procedures Manual #9-Site Safety Plan	OERR/HRSD	85/04/01
Field Standard Operating Procedures Manual #6-Work Zones	OERR/HRSD	85/04/01
Field Screening for Organic Contaminants in Samples from Hazardous Waste Sites	Roffman, et.al/Bus Corp, Carter/MDNR	86/04/02
Data Quality Objectives for Remedial Response Activities: Example Scenario: RI/FS Activities at a Site with Contaminated Soils and Groundwater	CDN Federal Programs Corp/OERR/ONPE	87/03/01
Data Quality Objectives for Remedial Response Activities:Development Process	CDN Federal Programs Corp/OERR/ONPE	87/03/01
Guidelines and Specifications for Preparing Quality Assurance Program Documentation	ORD/Quality Assurance Mgmt. Staff	87/06/01
RI/FS Improvements	Longest, N.L./OERR	87/07/23

TITLE	AUTHOR	DATE
A Compendium of Superfund Field Operations Methods	OERR/ONPE	87/12/01
Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses	Bleyler, R./Viar&Co./EPA DRW/HSRD	88/02/01
Information on Drinking Water Action Levels	Fields, Jr., T./OSWER/ERD	88/04/19
RI/FS Improvements Follow-up	Longest, H.L./OERR	88/04/25
Laboratory Data Validation Functional Guidelines for Evaluating Inorganics Analyses	EPA Data Review Work Group/HSED/	88/07/01
Field Screening Methods Catalog: User's Guide	OERR/HSED	88/09/01
Gudiance for Conducting Remedial Investigations and Feasibility Studies under CERCLA	OSWER/OERR	88/10/01
Index to Compendium of CERCLA Response Selection Guidance Documents	ONPE/PRC Environmental Mgmt, Inc.	89/05/01

ADMINISTRATIVE RECORD INDEX - UPDATE #2
NATIONAL PRESTO INDUSTRIES SITE
EAU CLAIRE, WISCONSIN

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	5	90/07/24	Letter re: General Notice of Liability	J. Kelley-USEPA	AT&T Technologies, Inc.	Correspondence	1
	5	90/07/24	Letter re: General Notice of Liability	J. Kelley-USEPA	J. Bartl-NPI	Correspondence	2
	5	90/07/24	Letter re: General Notice of Liability	J. Kelley-USEPA	J. Bartl-Natl. Defense Corp	Correspondence	3
	5	90/07/24	Letter re: General Notice of Liability	J. Kelley-USEPA	L. Walker-Dept. of Army	Correspondence	4
	5	90/07/24	Letter re: General Notice of Liability	J. Kelley-USEPA	Uniroyal, Inc.	Correspondence	5
	2	90/07/26	Letter re: Concurrence from WDNR on the selected remedy specified in the ROD	C. D. Desaday-WDNR	V. Adamkus-USEPA	Correspondence	6
	1	90/08/15	Memo re: Acknowledgement of Errors by DPRA during preparation of final Administrative Record	R. Harris-DPRA	J. Bell-USEPA	Memorandum	7
	1	90/08/15	Memo re: Acknowledgement of Errors by USEPA during preparation of Final ROD	S. Louisnathan-USEPA	NPI File	Memorandum	8
	2	90/08/17	Memo re: Errata Sheet for ROD (Appended as cover memo to the ROD)	M. Gifford-U.S. EPA	NPI File	Memorandum	9

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	130	90/08/01	Record of Decision including Responsiveness Summary	USEPA		Reports/Studies	10

ADMINISTRATIVE RECORD INDEX
UPDATE #3
NATIONAL PRESTO INDUSTRIES SITE
EAU CLAIRE, WISCONSIN

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	90/08/07	Letter Re: Agenda for implementing Record of Decision (ROD)	David Neier, TOWN OF HALLIE	NATIONAL PRESTO INDUST.	CORRESPONDENCE	1
	4	90/08/07	Letter Re: Response to USEPA General Notice of Liability dated July 24, 1990	Susan H. Shumway, SHUMWAY & MERLE	L. Johnson, USEPA	CORRESPONDENCE	2
	1	90/08/09	Letter Re: Request for meeting concerning USEPA ROD	David Neier, TOWN OF HALLIE	M. Gifford-U.S. EPA	CORRESPONDENCE	3
	2	90/08/09	Letter Re: Preliminary response to USEPA General Notice of Liability concerning August 1, 1990 ROD	James F. Bartl, NATIONAL PRESTO INDUSTRIES (NPI)	M. Gifford-U.S. EPA	CORRESPONDENCE	4
	2	90/08/10	Letter Re: Response to July 26, 1990 General Notice of Liability concerning provision of an alternate water supply	Marion P. Herrington, SIDLEY & AUSTIN	L. Johnson, USEPA	CORRESPONDENCE	5

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	2	90/08/10	Letter Re: Hallie Town Hall & Chippewa Falls Public Library (NPI Repository Sites)	David H. Raihle, TOWN OF HALLIE	M. Gifford-U.S. EPA	CORRESPONDENCE	6
	14	90/08/16	Letter Re: Response to	James F. Bartl, NATIONAL PRESTO	M. Gifford-U.S. EPA	CORRESPONDENCE	7

ADMINISTRATIVE RECORD INDEX
UPDATE #4
NATIONAL PRESTO INDUSTRIES SITE
EAU CLAIRE, WISCONSIN

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	91/03/14	Letter re: Section 106 Unilateral Administrative Order U. S. EPA Docket No. V-W-/91-C-091 MDC Intends to comply with the terms of the order	J. Bartl-MDC	M. Gifford-U.S. EPA	Correspondence	1
	1	91/03/14	Letter re: Section 106 Unilateral Administrative Order U.S. EPA Docket No. V-W-/91-C-091 NPI intends to comply with the terms of the order	J. Bartl-NPI	M. Gifford-U.S. EPA	Correspondence	2
	9	91/03/14	Letter re: Position Statement on behalf of NPI/MDC with respect to March 8, 1991 Unilateral Administrative Order issued to NPI/MDC by U.S. EPA, with cover letter attached	R. Nauman-NPI	M. Gifford-U.S. EPA	Correspondence	3
	2	91/03/18	Letter re: Recovery of Barrels at Melby Road Disposal Site	J. Boettcher-WDNR	R. Nauman-NPI	Correspondence	4

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	2	91/03/21	Letter re: Section 106 Unilateral Administrative Order, NPI U.S. EPA Docket No. V-W-91-c-091	R. Nauman-NPI	M. Gifford-U.S. EPA	Correspondence	5
	4	91/03/28	Letter re: U.S.EPA review of the Draft Remedial Action Work Plan for Providing Alternate Drinking Water Supplies for the Affected Area	M. Gifford-U.S. EPA	R. Nauman-NPI	Correspondence	6
	1	91/04/03	Letter re: Hallie Town Board and Sanitary District Commisioners approved and executed the MOU this date	D. Raihle-Town of Hallie	J. Bartl-NPI M. Gifford-U.S. EPA	Correspondence	7
	2	91/04/05	Letter re: U.S.EPA has completed its review of the Amended Partial Work Plan submitted by NPI and MDC pursuant to the Administrative Order issued to NPI/MDC by U.S.EPA on 3/8/91	M. Gifford-U.S. EPA	J. Bartl-NPI	Correspondence	8
	5	91/04/12	Letter re: Monitoring Well Sampling - NPI with Technical Memo re: Monitoring Well Sampling Methods, dated March 4, 1991 attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	9

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	91/04/15	Letter re: Modification of Plans for Split Sampling	R. Gilbertson-Roy F. Weston, Inc.	M. Gifford-U.S. EPA	Correspondence	10
	4	91/04/15	Letter re: QAPP Addendum with Technical Memorandum re: Monitoring Well Sampling Methods QAPP Amendment attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	11
	1	91/04/18	Letter re: Second Modification of Plans for Split Sampling	R. Gilbertson-Roy F. Weston, Inc.	M. Gifford-U.S. EPA	Correspondence	12
	2	91/04/23	Letter re: Update on Progress of Split Sampling	R. Gilbertson-Roy F. West, Inc.	M. Gifford-U.S. EPA	Correspondence	13
	1	91/05/07	Letter re: The Secretary of Sanitary District #1 informed the Town Atty that a check for $61,000.00 was delivered, but $52,000.00 was retained by NPI	D. Raihle-Town of Hallie	J. Bartl-NPI	Correspondence	14
	2	91/05/07	Letter re: Approval of Amended Partial Work Plan submitted pursuant to Section 106 Unilateral Administrative Order	M. Gifford-U.S. EPA	R. Nauman-NPI	Correspondence	15
	1	91/05/10	Letter re: Confirming NPI is issuing a check for $52,000.00	D. Raihle-Town of Hallie	J. Bartl-NPI	Correspondence	16

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	7	91/05/15	Letter re: Application for Payment No. 1 from Utility Enterprises, Ltd., Eau Claire, Wisconsin with cover letter attached	T. Marks-SEN	D. Neier-Town of	Correspondence	17
			mental MOU	Hallie, from the Office of Town Attorney			
	2	91/05/30	Letter re: Phased Feasibility Study for Groundwater Operable Unit	M. Gifford-U.S. EPA	R. Nauman-NPI	Correspondence	19
	18	91/06/04	Letter re: U.S.EPA Comments on the Draft Interim Feasibility Study Report for the NPI Site	M. Gifford-U.S. EPA	R. Nauman-NPI	Correspondence	20
	1	91/06/19	Letter re: Observation of Soil Borings	R. Gilbertson-Roy F. Weston, Inc.	J. Boettcher-WDNR	Correspondence	21
	1	91/07/08	Letter re: Groundwater Interceptor Well Discharge	L. Eder-Eder Associates	S. Spanel-CEC	Correspondence	22
	1	91/07/09	Letter re: Town of Hallie's position on indenification	D. Raihle, Town of Hallie Attorney	J. Bartl-NPI	Correspondence	23
	3	91/07/09	Letter re: Phased Feasibility Study for NPI	M. Gifford-U.S. EPA	R. Nauman-NPI	Correspondence	24
	1	91/07/11	Letter re: Receipt of July 9, 1991 letter	J. Bartl-NPI	D. Raihle-TOH Attorney	Correspondence	25

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	1	91/07/11	Letter re: Using Eau Claire's storm sewers and asking Eder to send the request and additional information to William Bittner-Director of Public Works for the City of Eau Claire	S. Spanel-City of Eau Claire	L. Eder-Eder Associates	Correspondence	26
	1	91/07/26	Letter re: Groundwater Interceptor Well Discharge	N. Andriansa-Eder Associates	W. Bittner-City Hall	Correspondence	27
	2	91/07/26	Letter re: Groundwater Interceptor Well Discharge	L. Eder-Eder Associates	W. Bittner-City Hall	Correspondence	28
	3	91/07/30	Letter re: Further RI Field Work and Coordination with City of Eau Claire	M. Gifford-U.S. EPA	R. Nauman-NPI	Correspondence	29
	1	91/08/02	Letter re: Groundwater Interceptor Well Discharge	W. Bittner-City of Eau Claire	L. Eder-Eder Associates	Correspondence	30
	10	91/08/00	Fact Sheet Entitled: U.S. EPA Recommends Cleanup Plan for On-Site Groundwater Contamination, NPI Superfund Site	U.S. EPA		Fact Sheet	31

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	10	91/03/22	Memo re: Approval of the First-Revision Quality Assurance Project Plan (QAPP) for the Agency's Oversight of PRP's RI Activities at the NPI Superfund Site Eau Claire, Wisconsin Oversight of the PRP's RI Activities at the NPI Site	V. Jones-U.S. EPA	J. Kelley-U.S. EPA	Memorandum	32
	14	91/04/09	Memorandum of Understanding between NPI, MDC, the Town of Hallie Sanitary Dist. No. 1 and the Town of Hallie with cover letter attached	L. Stupak-NPI	M. Gifford-U.S. EPA	Memorandum	34
	2	91/04/10	Memo re: Telephone Conference Regarding Sampling at NPI	J. Boettcher-WDNR	M. Gifford-U.S. EPA & File	Memorandum	35
	12	91/04/25	The Memorandum of Understanding between NPI/MDC and the City of Eau Claire, with cover letter attached	R. Nauman-NPI	M. Gifford-U.S. EPA	Memorandum	36
	3	91/05/21	Memo re: Summary of our May 16, 1991 Meeting in Madison	L. Eder-Eder Associates	M. Gifford-U.S. EPA	Memorandum	37
	2	91/03/11	EPA Environmental News Release re: EPA Orders NPI to Provide Permanent Drinking Water Supply	U.S.EPA-Region V	Public	News Release	38

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	1	91/03/28	EPA Environmental News Release re: National Presto Violates Order on Presto Study; Public Meeting, September 12	M. Gifford & S. Pastor-U.S.EPA-Region V	Public	News Release	39
	3	91/04/03	Certification of Authenticity re: the Administrative Order issued by U.S.EPA to NPI and MDC on 3/8/91	M. Gifford-U.S. EPA	J. Comerford-NPI	Pleadings/Orders	41
	2	91/04/17	EPA Certificate of Authenticity with cover letter attached	D. Ullrich-U.S.EPA (Certificate) J. Comerford-NPI (Correspondence)	M. Gifford-U.S. EPA	Pleadings/Orders	42
	26	91/03/19	Progress Report No. 56 February 1991 - NPI with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	43
	35	91/04/04	Submittal by NPI/MDC of Amended Partial Work Plan Pursuant to March 8, 1991 Section 106 Unilateral Administrative Order with cover letter attached	R. Lieble-NPI	M. Gifford-U.S. EPA	Reports/Studies	44
	2	91/04/08	Validated results of TCLP analyses for Lagoon No. 1 samples with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	45

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
	15	91/04/11	Submittal by NPI/MDC of Amended Partial Work Plan pursuant to March 8, 1991, Section 106 Unilateral Administrative Order with cover letter attached	R. Nauman-NPI	M. Gifford-U.S. EPA	Reports/Studies	46
	8	91/04/12	Validated results of the January 1991 quarterly sampling of private wells for VOCs with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	47
	9	91/04/15	Progress Report No. 57 March 1991, with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	48
	3	91/05/13	Progress Report No. 58 April 1991, with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	49
	5	91/05/15	Progress Report No. 1 April 1991 - Section 106 Unilateral Order NPI Superfund Site with cover letter attached	R. Nauman-NPI	M. Gifford-U.S. EPA	Reports/Studies	50
	14	91/05/22	Groundwater Sampling and Oversight of RI Field Activities at NPI with photographs and cover letter attached 4/16-24/91	D. Williams & R. Gilbertson-Roy F. Weston, Inc.	M. Gifford-U.S. EPA	Reports/Studies	51

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	4	91/06/07	Progress Report No. 2 May 1991 - Section 106 Unilateral Order - NPI with cover letter attached	R. Nauman-NPI	M. Gifford-U.S. EPA	Reports/Studies	52
	7	91/06/12	Progress Report No. 59 May 1991, with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	53
	4	91/07/10	Progress Report No. 3 (Misidentified as Report No.2), June 1991, Section 106 Unilateral Order, NPI Superfund Site, with cover letter attached	R. Nauman-NPI	M. Gifford-U.S. EPA	Reports/Studies	54
	3	91/07/18	Progress Report No. 60 June 1991, with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	55
	4	91/08/12	Progress Report No. 4 July 1991, Section 106 Unilateral Order, NPI Superfund Site, with cover letter attached	R. Nauman-NPI	M. Gifford-U.S. EPA	Reports/Studies	56
	-40	91/08/00	Proposed Plan - Interim Remedial Action for Groundwater-NPI Superfund Site	U.S. EPA		Reports/Studies	57
	-115	91/08/00	Draft Phased Feasibility Study Report - 2nd Revision, NPI, Project #497-13	Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	58

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	44	91/06/14	Collection of Aquifer Samples for FOC Analysis, with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Sampling/Data	59
	35	91/07/25	Corrected draft tables containing monitoring well VOC data for NPI and the raw data packages and data validation reports for the April 1991 monitoring well samples	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Sampling/Data	60
	196	91/07/26	Analytical results of the split sampling exercise of April 1991 with cover letter attached	R. Gilbertson-Roy F. Weston, Inc.	M. Gifford-U.S. EPA	Sampling/Data	61
	81	91/07/26	Validation reports for metals, analyses of monitoring well samples collected in April 1991 at and near the NPI site	W. Warren-Eder Associates	M. Gifford-U.S. EPA	Sampling/Data	62

REMEDIAL ACTION

ADMINISTRATIVE RECORD

(Index and Documents)

for the

NATIONAL PRESTO INDUSTRIES SITE

UPDATE NO. 5

EAU CLAIRE, WISCONSIN

OCTOBER 1991

United States Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

INTRODUCTION

These documents comprise the Administrative Record for the National Presto Industries Superfund Site - Update No. 5. An index of the documents in the Administrative Record is located at the front of the first volume.

The Administrative Record is also available for public review at EPA's Region V Office, 230 South Dearborn, Chicago, Illinois, 60604. Questions concerning the Administrative Record should be addressed to the EPA Administrative Record Coordinator.

The Administrative Record is required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA).

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NATIONAL PRESTO INDUSTRIES SITE
EAU CLAIRE, WISCONSIN

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	1	91/08/12	Letter re: Initial review of Eau Claire Municipal Well Field Site, #3 reveals that a possible source of the contamination is the Eau Claire Ordnance Works once owned by the Dept. of Defense	L. Walker-Dept. of Army (Environmental, Safety and Occupational Health)	J. Traub-U.S.EPA	Correspondence	1
	1	91/08/22	Letter forwarding a copy of the draft Phased Feasibility Study Report prepared by NPI	G. Rozmus-Eder Associates	Information Repository	Correspondence	2
	1	91/08/22	Letter forwarding the Proposed Plan for NPI to the Administrative Record for the site	M. Gifford-U.S. EPA, RPN	R. Killbridge-CPPL	Correspondence	3
	1	91/08/22	Letter forwarding the Proposed Plan for NPI to the Administrative Record for the site	M. Gifford-U.S. EPA, RPN	S. Sipple-Hallie Town Hall	Correspondence	4
	1	91/08/26	Letter forwarding the Interim Remedial Action Proposed Plan for the NPI site	M. Gifford-U.S. EPA, RPN	L. Walker-U.S. Dept. Army	Correspondence	5

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	3	91/09/18	Letter re: Review of the Revised Draft Feasibility Study for NPI dated August 1991	M. Gifford-U.S. EPA, RPN	R. Nauman-NPI, Inc.	Correspondence	6
	5	91/09/19	Letter re: General Notice of Liability	J. Kelley-U.S.EPA	CT Corp. System	Correspondence	7
	5	91/09/19	Letter re: General Notice of Liability	J. Kelley-U.S.EPA	L. Walker-U.S. Dept.	Correspondence	8
	5	91/09/19	Letter re: General Notice of Liability	J. Kelley-U.S.EPA	NPI, Inc.	Correspondence	9
	5	91/09/19	Letter re: General Notice of Liability	J. Kelley-U.S.EPA	National Defense Corp.	Correspondence	10
	5	91/09/19	Letter re: General Notice of Liability	J. Kelley-U.S.EPA	Prentice-Hall Corp.	Correspondence	11
	10	91/04/22	Memo re: Role of the Baseline Risk Assess-ment in Superfund Remedy Selection Decisions	D. Clay-U.S.EPA	U.S.EPA - URD Directors	Memorandum	12
	7	91/09/20	Memo re: Request for WPDES Limits for Contaminated Ground Water Extraction System with Data Tables attached	J. Boettcher-WDNR	D. Mentz-WDNR	Memorandum	13
	2	91/08/20	EPA Seeks Comments on Presto Study; Public Meeting Sept. 12, 1991	U.S.EPA-Region V	Public	News Release	14
	2	91/10/04	EPA Picks Cleanup Plan for 4 Wisconsin Sites	U.S.EPA		News Release	15

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	1	91/08/20	U.S.EPA's Advertisement Announcing Commencement of Public Comment Period to Accept Comments on the Proposed Plan and Phased Feasibility Study of On-Site Contaminated Groundwater	U.S.EPA	Public	Public Comments	16
	1	91/08/24	Comments on the recommended cleanup plan for on-site groundwater contamination at NPI	T. & C. Russell-Area Resident	S. Pastor-U.S.EPA	Public Comments	17
	1	91/09/06	Comments on the recommended cleanup plan for the NPI site	R. & D. Pahl-Area Resident	S. Pastor-U.S.EPA	Public Comments	18
	1	91/09/10	Comments on the recommended cleanup plan for the NPI site	N. Stephenson-Area Resident	S. Pastor-U.S.EPA	Public Comments	19
	1	91/09/11	Comments on the recommended cleanup plan for the NPI site	D. Hedrington-Area Resident	S. Pastor-U.S.EPA	Public Comments	20
	1	91/09/12	Public Meeting Agenda for NPI regarding the Proposed Plan for Cleanup of On-Site Ground-Water Contamination	U.S.EPA-Region V	Public	Public Comments	21
	1	91/09/12	Comments on the recommended cleanup plan for the NPI site	T. & C. Sippel-Area Residents	S. Pastor-U.S.EPA	Public Comments	22
	1	91/09/16	Comments on the recommended cleanup plan for the NPI site	G. Bartz-Area Resident	S. Pastor-U.S.EPA	Public Comments	23

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	3	91/09/16	Letter re: Town of Hallie comments to the cleanup plan for the on-site groundwater contamination at NPI	D. Neier-Town of Hallie	S. Pastor-U.S.EPA	Public Comments	24
	1	91/09/19	Comments on the recommended cleanup plan for the NPI site	C. Maion-Area Resident	S. Pastor-U.S.EPA	Public Comments	25
	1	91/09/19	Comments on the recommended cleanup plan for the NPI site	D. Woodford-Area Resident	S. Pastor-U.S.EPA	Public Comments	26
	1	91/09/19	Comments on the recommended cleanup plan for the NPI site	G. Annis-Area Resident	S. Pastor-U.S.EPA	Public Comments	27
	1	91/09/19	Comments on the recommended cleanup plan for the NPI site	D. Merrill-Area Resident	S. Pastor-U.S.EPA	Public Comments	28
	1	91/09/20	Comments on the recommended cleanup plan for the NPI site	G. Sierk-Area Resident	S. Pastor-U.S.EPA	Public Comments	29
	2	91/09/23	Letter re: Comments concerning the recommended cleanup plan for NPI	Darryll Farmer-Eau Claire City/County Health Dept.	S. Pastor-U.S.EPA	Public Comments	30
	15	91/08/12	Progress Report No. 61 July 1991 NPI, Inc. Site with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA RPN	Reports/Studies	31
	8	91/08/12	Field Oversight Report for Aquifer Pumping Test with cover letter attached	O. Patel-Roy F. Weston, Inc.	M. Gifford-U.S. EPA, RPN	Reports/Studies	32

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	5	91/09/18	Progress Report No. 62 August 1991 NPI, Inc. Site with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA, RPN	Reports/Studies	33
	48	91/09/19	Addendum to Phased Feasibility Study On-Site Groundwater Operable Unit Melby Road Site at the NPI Site with cover letter attached	W. Warren-Eder Associates	M. Gifford-U.S. EPA, RPN	Reports/Studies	34
	153	91/09/30	Record of Decision Selected Interim Action Alternative includes Responsiveness Summary and State Concurrence Letter	U.S.EPA		Reports/Studies	35
	48	91/09/13	Transcript of the Public Meeting for NPI regarding the Proposed Plan for Cleanup of On-Site Ground Water Contamination	S. Weniger-PRP, Notary Public - Northwestern Court Reporters		Transcript	36

REMEDIAL ACTION
ADMINISTRATIVE RECORD

(Index and Documents)
for the

NATIONAL PRESTO INDUSTRIES SITE

UPDATE NO. 6

EAU CLAIRE, WISCONSIN

JUNE 1992

United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, IL 60604

INTRODUCTION

These documents comprise the Administrative Record for the National Presto Industries Site - Update #6. An index of the documents in the Administrative Record is located at the front of the first volume along with an acronym guide used by EPA Agency Staff in selecting a response action at the site.

The Administrative Record is also available for public review at EPA's Region V Record Center, 77 West Jackson, 7th Floor, Chicago, Illinois, 60604. Question concerning the Administrative Record should be addressed to the U.S.EPA Waste Management Division Records Manager.

The Administrative Record is required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA).

NOTE: Document 83 of the Administrative Record has a video tape available for review at EPA's Region V Record Center.

National Presto Industries Site
Remedial Action - Update #6
Administrative Record

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NATIONAL PRESTO INDUSTRIES SITE - UPDATE #6
EAU CLAIRE, WISCONSIN

ACRONYM	DEFINITION
BER	Bureau of Endangered Resources
CES	Chemical & Environmental Services, Inc.
FS	Feasibility Study
HR/Eng.	Heritage Remediation/Engineering, Inc.
NPI	National Presto Industries
QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
RI/FS	Remedial Investigation
ROD	Record of Decision
SVOC	Semivolatile Organic
U.S.EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound
WDNR	Wisconsin Department of Natural Resources
WPDES	Wisconsin Pollution Discharge Elimination System
WR&R	Waste Research & Reclamation, Inc.

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NATIONAL PRESTO INDUSTRIES SITE
EAU CLAIRE, WISCONSIN

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1	91/10/22	Letter re: Official repository letter for the Designation of Hallie Town Hall as Repository for the NPI Site - Update No. 5 Administrative Record	Denise Williams-U.S.EPA	Clerk-Hallie Town Hall	Correspondence	11
5	91/10/24	Letter re: Comparison of VOC Results for Monitoring Wells Bailed vs. Pumped Samples	William Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	12
5	91/10/24	Letter re: Summary of the events and findings that have occurred during the past several months regarding the NPI site	Michael Gifford-U.S.EPA	R. Nauman-NPI, Inc.	Correspondence	13

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1	91/10/25	Letter re: Recent ad in the paper indicated Hallie would be a repository for the ROD and has not received a copy of the ROD	David Raihle-Town of Hallie	M. Gifford-U.S.	EPA Correspondence	14
1	91/10/28	Letter re: Find the proposal for collecting spent forge compound samples from Lagoon No. 1 to be acceptable, but questions were formulated	Michael Gifford-U.S.EPA	G. Rozmus-Eder Associates	Correspondence	15
	91/10/30	Letter re: Comments on the work plan discussed in letter dated Oct. 14, 1991	Leonard Eder-Eder Associates	M. Gifford-U.S. EPA	Correspondence	16
2	91/10/31	Letter re: Implementation of the Sept. 30, 1991, Record of Decision for the Remediation of Contaminated Groundwater	Richard Nauman-NPI, Inc.	M. Gifford-U.S. EPA	Correspondence	17
2	91/10/31	Letter re: Lagoon 1 Sample Collection Procedures	Gary Rozmus-Eder Associates	M. Gifford-U.S. EPA	Correspondence	18
1	91/11/04	Letter re: Sampling of Lagoon No. 1	Michael Gifford-U.S.EPA	G. Rozmus-Eder	Correspondence	19
6	91/11/07	Modification to the RI/FS Administrative Order by Consent for NPI, Inc. Site with cover letter attached	Michael Gifford-U.S.EPA	R. Nauman-NPI	Pleadings/Orders	20

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4	91/11/12	Progress Report No. 7 October 1991 - Section 106 Unilateral Order NPI, Inc. with cover letter attached	Richard Nauman-NPI, Inc.	M. Gifford-U.S. EPA	Reports/Studies	21
89	91/11/14	Progress Report No. 64 October 1991 - NPI, Inc. with cover letter attached	William Warren-Eder Associates	M. Gifford-U.S.EPA	Reports/Studies	22
3	91/11/19	Letter forwarding drawing which shows the locations of all monitoring wells at and near the NPI site and enclosed are tables that provide construction details for U.S.EPA monitoring wells	William Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	23
2	91/11/20	Letter re: Documentation of conversation	James Boettcher-WDNR	M. Gifford-U.S. EPA	Correspondence	24
2	91/11/20	Letter re: Modification to the RI/FS Administrative Order by Consent for NPI, Inc.	Richard Nauman-NPI, Inc.	M. Gifford-U.S. EPA	Correspondence	25
	91/11/26	Letter re: Proposed Monitoring Well Locations with maps attached	William Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	26
4	91/12/02	Letter re: RCRA Status of Waste Forge Compound	Richard Nauman-NPI, Inc.	B. Zellner-WDNR	Correspondence	27

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5	91/12/03	Letter re: Monitoring Well Sampling	William Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	28
2	91/12/03	Memo re: Addendum to the QAPP for Oversight of RI Field Activities at NPI, Inc. Site	Michael Gifford-U.S.EPA	V. Jones-U.S.EPA	Memorandum	29
2	91/12/06	Memo re: Conditional Approval of the Addendum to the Approved Oversight QAPP for Sampling and Analysis of New Monitoring Well at the NPI, Inc. Site	Valerie Jones-U.S.EPA	J. Meyka-U.S.EPA	Memorandum	30
	91/12/06	Letter re: WPDES Permit Limits for the NPI, Inc. Groundwater Pump and Treat Interim Action	James Boettcher-WDNR	M. Gifford-U.S. EPA	Correspondence	31
10	91/12/09	Letter re: Proposed Treatability Studies	Gary Rozmus-Eder Associates	M. Gifford-U.S. EPA	Correspondence	32
5	91/12/09	Letter re: Table 1 - Monitoring Well Sampling and analyses for the Dec. 1991 groundwater sampling event	William Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	33
142	91/12/09	Phased Feasibility Study Report for the NPI, Inc. Site with cover letter attached	Gary Rozmus-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	34

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3	91/12/11	Letter re: Table of monitoring wells and analytical requirements includes the changes of Dec. 10, 1991	William Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	36
4	91/12/12	Progress Report No. 8 November 1991 - Section 106 Unilateral Order NPI, Inc. with cover letter attached	Richard Nauman-NPI, Inc.	M. Gifford-U.S. EPA	Reports/Studies	37
6	91/12/12	Progress Report No. 65 November 1991 - NPI, Inc. with cover letter attached	William Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	38
1	91/12/13	Letter forwarding a videotape documenting the Nov. 7, 1991, sampling of forge compound	Dennis Kugle-Eder Associates	M. Gifford-U.S. EPA	Correspondence	39
6	91/12/16	Modification to Administrative Order by Consent for NPI, Inc. Site with cover letter attached	Larry Johnson-U.S.EPA	J. LaFontaine-WDNR	Pleadings/Orders	40
7	91/12/16	Modification to Administrative Order by Consent for NPI, Inc. with cover letter attached	Larry Johnson-U.S.EPA	M. Cohen-NPI, Inc.	Pleadings/Orders	41

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1	91/12/19	Letter re: Returning the signed consent order	John LaFontaine-WDNR	L. Johnson-U.S.EPA	Correspondence	42
6	91/12/23	Modification to Administrative Order by Consent	David Ullrich-U.S.EPA		Pleadings/Orders	42
2	91/12/23	Letter re: Hazardous Waste Determination	Barbara Zellmer-WDNR	R. Nauman-NPI, Inc.	Correspondence	44
1	91/12/24	Letter re: Modification to Administrative Order by Consent for NPI, Inc. Site	Richard Nauman-NPI, Inc.	L. Johnson-U.S.EPA	Correspondence	45
4	92/01/09	Letter re: Oversight of RI Field Investi- gation Activities	Darlene Williams-Roy F. Weston, Inc.	M. Gifford-U.S. EPA	Correspondence	46
3	92/01/10	Progress Report No. 9 December 1991 - Section 106 Unilateral Order NPI, Inc. with cover letter attached	Richard Nauman-NPI, Inc.	M. Gifford-U.S. EPA	Reports/Studies	47
5	92/01/21	Letter re: Waste Forge Compound Analyses and Pilot Scale Testing	Dennis Kugle-Eder Associates	R. Nauman-NPI, Inc.	Correspondence	48
1	92/01/27	Letter forwarding 3 sets of design drawings for the Interim Action-On-Site Groundwater	Stephen Nadjiyana-Eder Associates	M. Gifford-U.S. EPA	Correspondence	49
1	92/01/27	Letter forwarding 3 copies of the Interim Remedial Design Package for the NPI, Inc. Site	William Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	50

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1	92/01/29	Letter re: Abandonment of Private Wells in the Affected Area	Larry Johnson-U.S.EPA	D. Neier-Hallie Town Hall	Correspondence	51
2	92/02/04	Letter re: Town of Hallie Sanitary District No. 1 Payment Request No. 16	Richard Nauman-NPI, Inc.	M. Gifford-U.S.EPA	Correspondence	52
3	92/02/07	Progress Report No. 10 January 1992 - Section 106 Unilateral Order NPI, Inc. with cover attached	Richard Nauman-NPI, Inc.	M. Gifford-U.S. EPA	Reports/Studies	53
	92/02/12	Letter re: Application for issuance of a WPDES Permit	William Warren-Eder Associates	M. Witt-WDNR	Correspondence	54
2	92/02/13	Memo re: Review of Interim Remedial Design Package On-Site Groundwater for NPI, Inc. Site	Mark Vendl-U.S.EPA	M. Gifford-U.S. EPA	Memorandum	55
3	92/02/13	Progress Report No. 67 January 1991 - NPI, Inc. with cover letter attached	William Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	56
1	92/02/13	Letter re: Town of Hallie Sanitary District No. 1 Payment Request No. 16	Michael Gifford-U.S.EPA	R. Nauman-NPI, Inc.	Correspondence	57

PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE	DOCNUMBER
45	92/02/14	The Flowpath User's Manual Version 3 will be discussed with U.S.EPA and WDNR in the telephone conversation of Feb. 13, 1992; cover letter is attached	William Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	58
6	92/02/24	Minutes from the Special Meeting held at the Hallie Town Hall at 7:30 p.m. on Feb. 24, 1992	Shirley Sippel-Sanitary District #1/Town of Hallie	M. Gifford-U.S. EPA	Meeting Notes	59
5	92/02/25	Letter re: Proposal on the interim water service rates	David Sheerd-Public Service Commission of Wisconsin	J. Hyre-Hallie Sant. Dist.	Correspondence	60
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3	92/02/27	Phone Conversation re: Discussed issues relating to the City of Eau Claire storm sewer that NPI proposes to discharge treated groundwater to as part of ground-water remediation efforts at NPI	James Boettcher-WDNR	M. Gifford-U.S. EPA	Phone Records	62

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1	92/03/11	Letter forwarding the Validated Raw VOC Data Packages for the monitoring wells sampled in Dec. 1991	William Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	71
4	92/03/12	NPI, Inc. Summary of March 4, 1992 Meeting	Leonard Eder-Eder Associates	M. Gifford-U.S. EPA	Correspondence	72
45	92/03/12	Updated Raw Data Tables for VOCs in groundwater which include the validated results of the December 1991 monitoring well sampling with cover letter attached	William Warren-Eder Associates and Hazelton Laboratories	M. Gifford-U.S. EPA	Reports/Studies	73
3	92/03/13	Letter re: Comments on the annotated version of the draft RI submitted	Leonard Eder-Eder Associates	M. Gifford-U.S. EPA	Correspondence	74
	92/03/16	Progress Report No. 68 February 1992 - NPI, Inc. with cover letter attached	William Warren-Eder Associates	M. Gifford-U.S. EPA	Reports/Studies	75
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17	92/03/23	Analytical Results of Groundwater Split Samples collected in April 1992 with cover letter attached	Omprakash Patel-Roy F. Weston, Inc.	M. Gifford-U.S. EPA	Reports/Studies	80
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4	92/04/10	Letter forwarding two copies of the revised Interim Action Design Package for the NPI, Inc. with changes to the specifications in memorandum attached	William Warren-Eder Associates	M. Gifford-U.S. EPA	Correspondence	87
3	92/04/10	Progress Report No. 12 March 1992 - Section 106 Unilateral Order NPI, Inc. with cover letter attached	Richard Nauman-NPI, Inc.	M. Gifford-U.S. EPA	Reports/Studies	88
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U.S. EPA ADMINISTRATIVE RECORD
NATIONAL PRESTO INDUSTRIES, INC.
EAU CLAIRE, WISCONSIN
UPDATE #7
11/18/94

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84	04/08/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Approval of the Final Soil Vapor Extraction Pilot Test Work Plan	2
85	04/11/94	Brew, N., Eder Associates	Chow, E., U.S. EPA	Letter re: Soil Vapor Extraction Pilot Test at the Melby Road Disposal Site	2
86	04/12/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: Soil Vapor Extraction Pilot Test Schedule	1
87	04/13/94	Brew, N., Eder Associates	Chow, E., U.S. EPA	Letter re: Soil Vapor Extraction Pilot Test Schedule	1
88	04/18/94	Cohen, M. and Bartl, J., National Presto Industries, Inc.	Furey, E., U.S. EPA	Letter re: NPI's Commitment to Completion of the RI/FS	2
89	04/19/94	Bartl, J., National Presto Industries, Inc.	Furey, E., U.S. EPA	Letter re: NPI's Commitment to Completion of the RI/FS	2
90	04/22/94	Brew, N., Eder Associates	Chow, E., U.S. EPA	Letter re: Status of the Low Temperature Thermal Desorption Technology Evaluating w/Attachments	20
91	04/26/94	Furey, E., U.S. EPA	Bartl, J., National Presto Industries, Inc.	Letter re: Completion of the RI/FS w/Attached Unsigned Consent for Entry and Access	7
92	04/29/94	Bartl, J., National Presto Industries, Inc.	Furey, E., U.S. EPA	Letter re: NPI's Response to U.S. EPA's Letter of April 26, 1994 Concerning Completion of the RI/FS	1

DOC#	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
93	05/02/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter Requesting NPI to Submit a Preliminary Evaluation of the SVE Data Obtained April 26-28, 1994	1
94	05/04/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter Concerning NPI's Rescheduling of Field Maps re: the Soil Vapor Extraction Pilot Test	1
95	05/05/94	Lund, J., Eder Associates	Chow, E., U.S. EPA	Letter re: Status of the Interim Remedial Action System w/Attachments	4
96	05/06/94	Brew, N., Eder Associates	Chow, E., U.S. EPA	Letter re: Exhaust Gas and Soil Gas Monitoring Samples for the Soil Vapor Extraction Pilot Test	1
97	05/06/94	Furey, E., U.S. EPA	Bartl, J., National Presto Industries, Inc.	Letter re: NPI's Commitment Required by U.S. EPA's Letter of April 26, 1994 concerning Past Oversight Costs	1
98	05/06/94	Nauman, R., National Presto Industries, Inc.	Chow, E., U.S. EPA	Letter re: NPI's Summary of the Chronology of the Soil Vapor Extraction Pilot Test	2
99	05/10/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Response to NPI's May 6, 1994 Letter Summarizing the Chronology of the Soil Vapor Extraction Pilot Test	4
100	05/11/94	Bartl, J., National Presto Industries, Inc.	Furey, E., U.S. EPA	Letter re: NPI's Commitment to Complete the FS w/Attached May 11, 1994 Signed Consent for Entry and Access	4
101	05/12/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries,	Letter re: U.S. EPA/WDNR's Review of the Soil Vapor Extraction Pilot Test Data Evaluation	2
102	05/13/94	Furey, E., U.S. EPA	Bartl, J., National Presto Industries,	Letter re: NPI's Commitment to Completion of the RI/FS	1
103	05/25/94	Brew, N., Eder Associates	Chow, E., U.S. EPA	Letter re: Proposed Method to Collect Samples for the Low Temperature Thermal Desorption Treatability Test	2

DOC#	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
104	05/27/94	Nauman, R., National Presto Industries, Inc.	U.S. EPA/Superfund Accounting	Letter re: RI/FS Oversight Costs	1
105	06/06/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA/WDNR's Review of the Proposed Sampling Method for the Low Temperature Thermal Desorption Treatability Test	2
106	06/10/94	San, D., Eder Associates	Chow, E., U.S. EPA	Letter re: Work Plan for Soil Vapor Extraction Pilot Test	1
107	06/16/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: Additional Soil Vapor Extraction Testing	1
108	06/21/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA/WDNR's Initial Review of the Draft FS	2
109	06/23/94	Brew, N., Eder Associates	Chow, E., U.S. EPA	Letter re: Low Temperature Thermal Desorption Treatability Test Samples	3
110	06/30/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Approval to Proceed with the Low Temperature Thermal Desorption Treatability Test	1
111	07/20/94	Kleiman, J., U.S. EPA	Chow, E., U.S. EPA	Memorandum re: RCRA's Review of the Draft FS for ARARs	2
112	08/00/94	Eder Associates	U.S. EPA	Final RI Report Volume 1 of 5	363
113	08/00/94	Eder Associates	U.S. EPA	Final RI Report Volume 2 of 5: Drawings	19
114	08/00/04	Eder Associates	U.S. EPA	Final RI Report, Volume 3 of 5: Appendices A and B	493
115	08/00/94	Eder Associates	U.S. EPA	Final RI Report, Volume 4 of 5: Appendices C, D, E, and F	258

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116	08/00/94	Eder Associates	U.S. EPA	Final RI Report, Volume 5 of 5: Appendices G, H, and I	367
117	08/00/94	Eder Associates	U.S. EPA	Melby Road Disposal Site Investigation Report	199
118	09/02/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA/WDNR's Comments on the Draft FS Report	18
119	08/18/94	Chow, E., U.S. EPA E., U.S. EPA	Lynch, E., WDNR	Letter re: U.S. EPA's Determination that the Waste Forge Compound is a RCRA Hazardous Waste w/Attachments	19
120	09/12/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Approval of the Final RI Report w/Attached Distribution List	2
121	09/20/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA/WDNR's Review of the Soil Vapor Extraction Pilot Test Report	5

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77 W. JACKSON BLVD.
CHICAGO, IL 60604-3590
11/18/94

DOC#	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	07/00/89	Eder Associates	U.S. EPA	Organic Data Packages for Melby Road Disposal Site Soil Samples Collected July 1989	0
2	07/00/89	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Groundwater Samples Collected July 1989	0
3	04/30/90	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Private Drinking Water Well Samples Collected January 1990 w/Attached Cover Letter	0
4	05/00/90	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Private Drinking Water Well Samples Collected May 1990	0
5	06/00/90	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Lake Hallie Surface Water Samples Collected June 1990	0
6	07/00/90	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Groundwater Samples Collected During the Period May-June 1990	0
7	07/00/90	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Melby Road Disposal Site and East Disposal Site Soil Samples Collected July 1990	0
8	02/26/91	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Private Drinking Water Well Samples Collected September 1990 w/Attached Cover Letter	0
9	04/00/91	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Monitoring Well Samples Collected April 1991	0

DOC#	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
10	04/12/91	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Private Drinking Water Well Samples Collected January 1991 w/Attached Cover Letter	0
11	05/00/91	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Private Drinking Water Well Samples Collected May 1991	0
12	12/00/91	Eder Associates	U.S. EPA	Semivolatile Organic Data Packages for Groundwater Samples Collected December 1991	0
13	12/00/91	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Groundwater Samples Collected December 1991	0
14	04/00/92	Eder Associates	U.S. EPA	Semivolatile Organic Data Package for Groundwater Samples Collected April 1992	0
15	12/00/92	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Private Wells Collected December 1992	0
16	07/00/93	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Groundwater Samples Collected July 1993	0
17	08/00/93	Eder Associates	U.S. EPA	Inorganic and Organic Analytical Data Packages for Waste Forge Compound Samples Collected August 1993	0
18	08/00/93	Eder Associates	U.S. EPA	Semivolatile and Volatile Organic Data Packages for Soil Samples Collected at Melby Road	0
19	02/00/94	Eder Associates	U.S. EPA	Volatile Organic Data Packages for Groundwater Samples Collected February 1994	0

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1	09/00/94	Eder Associates	U.S. EPA	Interim Remedial Action On-Site Groundwater Status Report	79
2	09/15/94	Spanel, S., City of Eau Claire	Chow, E., U.S. EPA	Letter re: Long Term Effects of Contamination on the City's Water Supply	1
3	09/27/94	Fenske, B., Eder Associates	Thon, S., WDNR	Letter re: the Contingency Plan for Groundwater Discharge	5
4	10/06/94	Chow, E., U.S. EPA	Spanel, S., City of Eau Claire	Letter re: U.S. EPA's Request for Information Concerning the City of Eau Claire's Long Term Water Plans for the Aquifer and the Capacity of the Air Stripping Tower	2
5	10/07/94	Gan, R., Eder Associates	Chow, E., U.S. EPA	Letter re: Eder's Responses to U.S. EPA's Comments on the Revised Draft Soil Vapor Extraction Pilot Study Report	4
6	10/13/94	Warren, W., Eder Associates	Chow, E., U.S. EPA	Interim Remedial Action On-Site Groundwater Report: Attachment to Request for Revised Sampling Schedule w/Attached Cover Letter	48
7	10/26/94	Brew, N., Eder Associates	Chow, E., U.S. EPA	Letter re: Description of the Melby Road Disposal Site Sampling Plan	5
8	10/27/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Approval to Proceed with the Proposed October 26, 1994 Melby Road Disposal Site Sampling Plan	1
9	11/02/94	Didier, P., WDNR	Muno, N., U.S. EPA	Letter re: Waste Classification of the Waste Forge Compound at the NPI Site	2

DOC#	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
10	11/23/94	Furey, E., U.S. EPA	Bartl, J., National Presto Industries, Inc.	Letter re: Hazardous Waste Determination for Waste Forge Compound at the NPI Site	2
11	11/29/94	Riedl, R., WDNR	Chow, E., U.S. EPA	Letter Forwarding Attached List of Specific Citations of Wisconsin ARARs for the NPI Site	10
12	11/30/94	Giesfeldt, N. and Lemcke, N., WDNR	Traub, J., U.S. EPA	Letter re: WDNR's Concern with U.S. EPA's Interpretation of Chapter 160, Stats., and Chapter WR 140, Wisconsin Administrative Code, Pertaining to Groundwater Quality	14
13	12/01/94	Riedl, R., WDNR	Nauman, R., National Presto Industries, Inc.	Letter re: Limits and Requirements for Discharge of Treated Groundwater at the NPI Site	2
14	12/06/94	Eder Associates	U.S. EPA	Presentation: December 6, 1994 North Well Field Analysis	23
15	12/19/94	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Review Comments on the September 20, 1994 Interim Remedial Action Status Report and the October 13, 1994 Attachment to Request for Revised Sampling Schedule	6
16	01/05/95	Warren, W., Eder Associates	Bittner, R., City of Eau Claire	Letter re: December 6, 1994 North Well Field Presentation	10
17	01/11/95	Comerford, J., National Presto Industries, Inc.	Chow, E., U.S. EPA	Letter re: NPI's General Comments on WDNR's November 30, 1994 Letter Pertaining to Groundwater Quality	9
18	01/13/95	Warren, W., Eder Associates	Chow, E., U.S. EPA	Letter re: Eder's Responses to U.S. EPA's Comments on the September 20, 1994 Interim Remedial Action On-Site Groundwater Status Report	11
19	02/02/95	Brew, N., Eder Associates	Chow, E., U.S. EPA	Letter re: Engineering Evaluation of In-Situ Air Sparging and Bioremediation	22

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20	02/02/95	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Review Comments on the Revised Soil Vapor Extraction Pilot Test Report w/Attached January 25, 1995 WDNR Review Comments	6
21	02/14/95	Traub, J., U.S. EPA	Giesfeldt, N. and Lemcke, N., WDNR	Letter re: U.S. EPA's Interpretation of Wisconsin WR 140 w/Attached February 13, 1995 U.S. EPA Memorandum	20
22	02/22/95	Bittner, N., City Eau Claire	Nauman, R., National Presto Industries, Inc.; et al.	Letter re: City of Eau Claire's Comments on Eder's December 6, 1994 Analysis of the North Well Field	2
23	02/23/95	Chow, E., U.S. EPA	Nauman, R., National Presto Industries,	Letter re: U.S. EPA's Comments on the January 3, 1995 Meeting Summary	2
24	02/24/95	Brew, N., Eder Associates	Chow, E., U.S. EPA	Letter re: Eder's Responses to U.S. EPA/WDNR's Comments on the Revised Draft Soil Vapor Extraction Pilot Study Report	23
25	02/27/95	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Review Comments on the September 1994 Draft FS Report w/Attached October 6, 1994 WDNR Review Comments	10
26	03/00/95	Eder Associates	U.S. EPA	Soil Vapor Extraction Pilot Study Report: Volume 1 of 2 (Text, Tables, and Figures)	148
27	03/00/95	Eder Associates	U.S. EPA	Soil Vapor Extraction Pilot Study Report: Volume 2 of 2 (Appendices A-G)	310
28	03/15/95	Bittner, N., City of Eau Claire	Chow, E., U.S. EPA	Letter: City of Eau Claire's Concerns Regarding the Selection of the Final Remedial Action for the NPI Site	2
29	04/00/95	Eder Associates	U.S. EPA	Melby Road Disposal Site Supplemental Investigation Report	65
30	04/26/95	Lemcke, J., WDNR	File/Attendees	Memorandum re: Summary of March 10, 1995 Meeting at U.S. EPA/Region 5 on WR 140 Interpretation and Implications for NPI Site w/Attachments	63

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31	06/12/95	Chow, E. and Furey, E., U.S. EPA	Lemcke, J., WDNR	Letter re: RCRA Subpart H Requirements as Potential ARAR for the NPI Site	4
32	06/16/95	Riedl, R., WDNR	Chow, E., U.S. EPA	Letter re: WDNR's Review Comments on (1) the Revised Interim Action Report; (2) Revised LTTD Treatability Study Report; and (3) Revised SVE Pilot Test Report	1
33	06/19/95	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Approval of the January 13, 1995 Interim Remedial Action Status Report	1
34	06/19/95	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Approval of the Revised Soil Vapor Extraction Pilot Test Report	1
35	06/21/95	Riedl, R., WDNR	Chow, E., U.S. EPA	Letter re: WDNR's Review Comments on the Revised FS Report	1
36	07/05/95	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Review Comments on the September 1994 Draft FS Report	4
37	07/06/95	Lemcke, J., WDNR	Chow, E., U.S. EPA	Letter re: Proposed Plan Language and WDNR's Preference Not to Use Federal ACLs for Plumes 3, 4 and 5	2
38	08/11/95	Warren, W., Eder Associates	Chow, E., U.S. EPA	Letter re: Status of Interim Remedial Action On Site Groundwater as of April 1995 w/Attachments	60
39	08/15/95	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: Interim Remedial Action Sampling	1
40	08/16/95	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Approval of the Melby Road Disposal Site Supplemental Investigation Report	1

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41	09/01/95	Chow, E., U.S. EPA	Nauman, R., National Presto Industries, Inc.	Letter re: U.S. EPA's Conditional Approval of the August 1995 Revised FS Report	3
42	09/08/95	Eder Associates	U.S. EPA	Final Feasibility Study Report: Volume 1 of 3 (Text, Tables, Figures)	574
43	09/08/95	Eder Associates	U.S. EPA	Final Feasibility Study Report: Volume 2 of 3 (Appendices A-D)	309
44	09/08/95	Eder Associates	U.S. EPA	Final Feasibility Study Report: Volume 3 of 3 (Appendices E-J)	384

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09/19/95

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1	04/20/94	Hazelton Environmental Services, Inc.	Eder Associates	Volatile Organic Data Packages for Groundwater Samples Collected March 31, 1994	0
2	07/01/94	Hazelton Environmental Services, Inc.	Eder Associates	Volatile Organic Data Packages for Groundwater Samples Collected on June 10, 1994	0
3	09/23/94	Hazelton Environmental Services, Inc.	Eder Associates	Volatile Organic Data Packages for Groundwater Samples Collected August 25, 1994	0
4	11/29/94	Hazelton Environmental Services, Inc.	Eder Associates	Volatile Organic Data Packages for Groundwater Samples Collected October 27, 1994	0
5	02/08/95	Hazelton Environmental Services, Inc.	Eder Associates	Volatile Organic Data Packages for Groundwater Samples Collected January 19, 1995	0
6	05/22/95	Hazelton Environmental Services, Inc.	Eder Associates	Volatile Organic Data Packages for Groundwater Samples Collected April 20, 1995	0
7	08/10/95	Hazelton Environmental Services, Inc.	Eder Associates	Volatile Organic Data Packages for Groundwater Samples Collected July 21 and 27, 1995	0
8	09/05/95	Eder Associates	U.S. EPA	Data Validation Report for Groundwater Monitoring Samples July 21 and 27, 1995	0

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EAU CLAIRE, WISCONSIN
UPDATE #9
05/17/96

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1	09/00/95	U.S. EPA	Public	Proposed Plan	16
2	09/18/95	U.S. EPA	Public	Public Notice re: Announcement of Public Comment Period on the Feasibility Study and the Proposed Plan (Eau Claire Leader-Telegram)	1
3	09/27/95	Northwestern Court Reporters	U.S. EPA	Transcript of the September 27, 1995 Proposed Plan Public Hearing	48
4	09/29/95	Stuart, J., S&S Industrial Services, Inc.	Chow, E., U.S. EPA	Letter Forwarding Attached Information Concerning the Geo-Cleanse Process for Remediation of Contaminated Soil and Groundwater	114
5	10/19/95	Riedl, R., WDNR	U.S. EPA	Letter re: WDNR's Comments on the Proposed Plan w/Attachment	3
6	10/20/95	Bittner, W., City of Eau Claire Department of Public Works	U.S. EPA	Letter re: City of Eau Claire's Comments on the Proposed Plan w/Attachment	4
7	10/20/95	Concerned Citizens	U.S. EPA	Three Public Comment Sheets re: Citizens' Comments on the Proposed Plan (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED)	3
8	10/23/95	Farmer, D., Eau Claire City/County Health Department	U.S. EPA	Public Comment Sheet re: Health Department's Comments on the Proposed Plan	1
9	11/00/95	Roy F. Weston, Inc.; et al.	U.S. EPA	Revised Community Involvement Plan	38

DOC#	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
10	11/03/95	Geo-Cleanse, Inc. and T&M Environ mental	U.S. EPA	Public Comment Sheet re: the Geo-Cleanse Process w/Attached Brochure	5
11	12/27/95	Lemcke, J., WDNR	Carney, W., U.S. EPA	Letter re: Clarification of WDNR Position on the Proposed Remedy	1
12	02/00/96	Eder Associates	U.S. EPA	Report: Study of the Natural Attenuation of TCE in Plume 1-2	92
13	02/13/06	Bartl, J., National Presto Industries, Inc.	Chow, E., U.S. EPA	Letter re: NPI's Request that Eder's February 1996 "Study of the Natural Attenuatin of TCE in Plume 1-2" Report be Included in the Official Record	1
14	02/29/96	Patel, O., Roy F. Weston, Inc.	Chow, E., U.S. EPA	Letter re: Weston's Review Comments on the "Study of the Natural Attenuation" Report for the NPI Site	4
15	03/01/96	Raykin, V., Eder Associates	Chow, E., U.S. EPA	Letter Forwarding Attached February 28, 1996 Memorandum to Eder Associates re: Biodegradation Rate of TCE in Groundwater	27
16	03/04/96	Giesfeldt, M., WDNR	Carney, W., U.S. EPA	Letter re: NPI Contingency Language	2
17	03/04/96	Didier, P., WDNR	Nauman, R., National Presto Industries, Inc.	Letter re: WDNR's Review Comments on the "Study of the Natural Attenuation of TCE in Plume 1-2" Report	2
18	05/09/96	Meyer, G., WDNR	Adamkus, V., U.S. EPA	Letter re: WDNR's Concurrence on the Selected Final Remedy for the National Presto Industries Site	2
19	05/15/96	Adamkus, V., U.S. EPA	U.S. EPA	Record of Decision w/Responsiveness Summary	197

NATIONAL PRESTO INDUSTRIES, INC. SITE
EAU CLAIRE, WISCONSIN

TABLE 1

TOTAL CARCINOGENIC AND NON-CARCINOGENIC RISKS

Receptor	Carcinogenic (Individual)	Noncarcinogenic Adult	Noncarcinogenic Child
Current Off-Site Resident	8.4E-07 to 3.7E-06	9.7E-03 to 1.4E-02	8.9E-02 to 1.3E-01
Future On-Site Resident	6.0E-05 to 3.8E-04	1.2E+00 to 2.6E+00	3.4E+00 to 6.6E+00
Recreational User*	8.4E-09 to 1.8E-07	2.9E-05 to 1.7E-04	4.7E-05 to 2.8-04
Worker*	4.4E-06 to 5.4E-05	5.9E-03 to 2.6E-02	NA

* Assumes current exposure point concentrations do not change in the future.
NA = Not applicable.

NATIONAL PRESTO INDUSTRIES, INC. SITE
EAU CLAIRE, WISCONSIN

TABLE 2

APPLICABLE OR RELEVANT AND APPROPRIATE
FEDERAL REGULATIONS

Standard, Requirement, Criterion or Limitation	Citation	Description
Safe Drinking Water Act	42 U.S.C. § 300g	
National Primary Drinking Water Standards	40 CFR 141	Established health-based standards (maximum contaminant levels) for public water supply systems.
National Secondary Drinking Water Standards	40 CFR 143	Establishes welfare-based standards (secondary MCLs) for public water supply systems.
Maximum Contaminant Level Goals	Public Law 99-339	Establishes drinking water quality goals at levels that are not known or anticipated to produce adverse health effects, with an adequate margin of safety. Only non-zero MCLGs are ARARs.
Clean Air Act	42 U.S.C. § 7401-7642	
National Primary and Secondary Ambient Air Quality Standards	40 CFR 50	Establishes ambient air quality standards (including lead and particulates) to control point source air emissions and protect public health and welfare.
National Emission Standards for Hazardous Air Pollutants	40 CFR 61	Establishes emission standards for designated hazardous air pollutants.
Solid Waste Disposal Act	42 U.S.C. § 6901-6987	
Identification and Listing of Hazardous Waste	40 CFR 261	Identifies solid wastes subject to regulation as hazardous wastes.
Standards Applicable to Generators of Hazardous Waste	40 CFR 262	Establishes standards for generators of RCRA wastes.
Standards Applicable to Transporters of Hazardous Waste	49 CFR 263	Establishes standards applicable to transporters of RCRA wastes.

Table 2 Continued. . .

Standard, Requirement, Criterion or Limitation	Citation	Description
Standards for Owners and Operators of Hazardous Waste TSD Facilities	40 CFR 264	Establishes minimum standards for managing facilities that treat, store or dispose of hazardous waste.
Land Disposal restrictions	40 CFR 268	Identifies hazardous waste prohibited from land disposal and situations where land disposal is acceptable.
Hazardous Materials Transportation Act	49 U.S.C. § 1801-1813	
Hazardous Materials Transportation Regulations	49 CFR 107,171-177	Establishes standards for transportation of hazardous wastes.
Toxic Substances Control Act	15 U.S.C. §2601-2629	
PCB Requirements	40 CFR 761	Establishes PCB waste storage and disposal requirements.

NOTES:

U.S.C. = United States Code
CFR = Code of Federal Regulations

NATIONAL PRESTO INDUSTRIES, INC. SITE
EAU CLAIRE, WISCONSIN

TABLE 3

APPLICABLE OR RELEVANT AND APPROPRIATE
STATE REGULATIONS

Standard, Requirement, Criterion or Limitation	Citation	Description
Wisconsin Ground-Water Quality Standards	WAC, Ch. NR 140	Establishes substance-specific ground-water quality standards, groundwater sampling and analysis procedures, and ranges of responses that may be required if a groundwater quality standard is exceeded.
Ground-Water Monitoring Well Requirements	WAC, Ch. NR 141	Establishes ground-water monitoring well standards.
Water Quality Standards for Wisconsin Surface Waters	WAC, Ch. NR 102	Establishes surface water quality standards that protect the public interest; designates the use categories of the surface waters and the water quality criteria that support these uses.
Surface Water Quality Criteria for Toxic Substances	WAC, Ch. NR 105	Establishes in-stream surface water standards for protection of aquatic life.
Hazardous Waste Management	WAC, Chs. NR 600-685	Establishes hazardous waste identification criteria, minimum standards for hazardous waste management and handling, and hazardous waste facility closure standards that protect health and the environment.
Wisconsin Solid Waste Management Regulations	WAC, Chs. NR 500-520	Establishes procedures for handling solid waste; licensing and operating solid waste management facilities; solid waste disposal facility performance standards and design, monitoring, reporting and closure requirements; and land spreading requirements.
Investigation and Remediation of Environmental Contamination	WAC, Chs. NR 718-726	Establishes the procedures and standards for cleaning up contaminated sites.
Management of PCBs and Products Containing PCBs	WAC, Ch. NR 157	Establishes procedures for handling and disposing of PCBs and products containing PCBs, and establishes methods for sampling, preparing samples and analyzing such materials for PCBs.
Wisconsin Air Pollution Control Regulations	WAC, Chs. NR 404, 445	Establishes primary and secondary ambient air quality standards and pollutant-specific emission limitations to maintain acceptable air quality and protect public health and the environment.
Wisconsin Drinking Water Rules	WAC, Ch. NR 109	Establishes maximum contaminants levels allowed in drinking water.

NATIONAL PRESTO INDUSTRIES, INC. SITE
EAU CLAIRE, WISCONSIN

TABLE 4

FEDERAL POLICIES AND GUIDANCE TO BE CONSIDERED

Safe Drinking Water Act

! Maximum Contaminant Level Goals

Clean Water Act

! Requirements established pursuant to Sections 131, 301, 302, 303, 304, 306, 307, 308, 402 403 and 404 of the Clean Water Act.

Other Federal Criteria, Advisories and Guidance

! PCB Spill Cleanup Policy (52 FT 10688, April 2, 1987).

! Waste load allocation procedures (40 CFR Parts 125, 130).

! EPA's Ground-Water Protection Strategy.

! Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites.

! TSCA Compliance Program Policy.

! EPA/DOT Guidance Manual on Hazardous Waste Transportation.

! EPA's RCRA Design Guidelines.
Landfill Design - Liner Systems and Final Cover.

! Technical Resource Documents ("TRDs").

- RCRA Ground-Water Monitoring Technical Enforcement Guidance Document.
- Evaluating Cover Systems for Solid and Hazardous Waste.
- Hydrologic Simulations of Solid Waste Disposal Sites.
- Landfill and Surface Impoundment Performance Evaluation.
- Closure of Hazardous Waste Surface Impoundments.
- Soil Properties, Classification, and Hydraulic Conductivity Testing.

! Test Methods for Evaluating Solid Waste

- Solid Waste Leaching Procedure Manual.

- Hydrologic Evaluation of Landfill Performance ("HELP") Model Hydrologic Simulation and Solid Waste Disposal Sites.

- A Method for Determining the Compatibility of Hazardous Wastes.

- Guidance Manual on Hazardous Waste Compatibility.

U.S. EPA Office of Water Guidance Documents

- Water Quality Guidance Documents
  - Water-Related Environmental Fate of 129 Priority Pollutants (1979)
  - Water Quality Standards Handbook (1983).
  - Technical Support Document for Water Quality-Based Toxics Control.
  - Developing Requirements for Direct and Indirect Discharges of CERCLA Wastewater (1987).

U.S. EPA Manuals from the Office of Research and Development.

- SW 846 Methods - laboratory analytic methods.
- Lab protocols developed pursuant to Clean Water Act section 304(h).

Other

- Occupational Safety and Health Act

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TABLE 5

STATE POLICIES AND GUIDANCE TO BE CONSIDERED

- Interim Policy for Promoting the In-State and On-Site Management for Hazardous Wastes in the State of Wisconsin (WDNR, March 14, 1991).

- Suggested Method for Estimating Hazardous Air Contaminant Emissions for Landfills.

<IMG SRC 0596298A>
<IMG SRC 0596298B>
<IMG SRC 0596298C>
<IMG SRC 0596298D>

May 9, 1996

Mr. Valdas Adamkus, Administrator
U.S. EPA Region V
77 W. Jackson
Chicago, IL 60604

SUBJECT: Concurrence on the Selected Final Remedy, National Presto Industries Site, Eau Claire, WI

<IMG SRC 0596298E>

Dear Mr. Adamkus:

The Department is providing you with this letter to document our concurrence with the remedy selected for the final actions at the National Presto Industries (NPI) Superfund site. The final remedy, as described in the draft Record of Decision, will address the remaining source control and groundwater cleanup needed, and is considered the final remedy for the NPI at the site. The selected remedy is alternative M-B1, D-B, W-B, GW1-A and GW5-A, which include:

- Soil Vapor Extraction at the Melby Road disposal site, with hot spot excavation and disposal as needed, and soil gas monitoring;
- Consolidation of Wastes at the Melby Road Disposal site, with excavation from the East Disposal Site and Drainage Ditch 3;
- Construction of a Multi-Layer/NR 660 Cap at the Melby Road Disposal Site, with long term groundwater monitoring and deed restrictions to limit land use from disturbing the cap integrity;
- Long Term Groundwater Monitoring at plumes 1-2 and 3, 4 and 5;
- Contingency for further actions if necessary at plumes 1-2; and
- Surface Water Monitoring in Lake Hallie, downgradient of Plumes 3, 4 and 5.

The costs for the selected remedy are estimated to be as follows:

Capital Cost	$3.274 M
Annual O&M First Year	$261,000
Total Present Worth	$6.542 M

We understand that if the potentially responsible parties (PRPs) do not agree to fund the remedy, it will be necessary for the State of Wisconsin to contribute 10% of the remedial action costs associated with the actions and 10% of the O&M costs for the first 10 years of groundwater extraction and treatment, and provide for all O&M after that, provided that no changes to the National Contingency Plan are made that would require an alternative cost allocation. We provide assurance of the State's willingness to provide this required state cost share on the assumption that U. S. EPA will pursue all feasible enforcement actions against the PRPs prior to expending the Fund at the site.

We understand that if the Fund is expended to conduct the remedy and if hazardous waste needing disposal is required to be managed off-site as part of the remedy, that the State of Wisconsin will be required to provide the assurances for hazardous waste management in §40 CFR 300.510(d) and (e) of the National Contingency Plan. The assurances are that a compliant hazardous waste facility is available, and that facility's use is consistent with our approved Capacity Assurance Plan.

We also understand that our staff will continue to work in close consultation with your staff during the pre-design, design and construction phases of the remedy.

Thank you for your support and cooperation in addressing the contamination problem at the NPI site. Should you have any questions regarding this matter, please contact Jane Lemcke, Superfund Remedial Unit Leader, at (608) 267-0554.

<IMG SRC 0596298F>

cc. Susan Sylvester, AD/5
Linda Meyer/Steve Thon, WD
Paul Didier, SW/3
Mark Giesfeldt/Jane Lemcke, SW/3
Eugenia Chow/Wendy Carney, U. S. EPA Region V.

<IMG SRC 0596298G>